

March 5, 1985

RELATED CORRESPONDENCE

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. 50-425

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APPLICANTS' FOURTH SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

These interrogatories and request for production of documents are directed to Joint Intervenors Campaign For a Prosperous Georgia/Georgians Against Nuclear Energy and pertain to Contention No. 8 as accepted by the Atomic Safety and Licensing Board in its "Memorandum and Order (Ruling on Intervenors' Objections to Order of September 5, 1984 and Other Matters)" (Nov. 5, 1984). These discovery requests constitute the Applicants' second round of discovery requests on Contention No. 8.

The interrogatories are filed pursuant to 10 C.F.R. § 2.740b, which requires that they be answered separately and fully in writing under oath or affirmation. According to the Stipulation of Parties on Discovery Schedule, such answers shall be served within 30 days after service of the interrogatories. These interrogatories are intended to be continuing in nature, and the answers must be immediately supplemented or amended, as appropriate,

should Intervenor obtain any new or differing information responsive to the interrogatories.

The request for production of documents is filed pursuant to 10 C.F.R. § 2.741, which requires that Intervenor produce and either furnish copies of, or permit Applicants to inspect and copy, any documents that are responsive to the request and that are in the possession, custody, or control of Intervenor. In accordance with the Stipulation of Parties on Discovery Schedule and with 10 C.F.R. § 2.741, such production must be effected within 30 days after service of this request. The request for production of documents is also continuing in nature, and Intervenor must produce immediately any documents they obtain which are responsive to the request.

I. INSTRUCTIONS

The following instructions and definitions apply to Applicants' interrogatories and request for production of documents.

1. When identification of a document is requested, briefly describe the document (i.e., letter, memorandum, book, pamphlet, etc.) and state the following information as applicable to the particular document: name, title, author, date of publication and publisher, addressee, date written or approved, the Applicants' identification number (for those documents which have been produced by Applicant

to Intervenor(s) in this proceeding), and the name and address of the person(s) having possession of the document.

2. When identification of a person is requested, state that person's full name, present employer or business affiliation, present address, and present telephone number.

3. "VEGP" means the Vogtle Electric Generating Plant, Units 1 and 2.

4. "Intervenors," "you," or "your" refers to Georgians Against Nuclear Energy (hereinafter "GANE") and/or Campaign for a Prosperous Georgia (hereinafter "CPG"), and all members, employees, agents, consultants, attorneys, or other representatives of GANE or CPG.

5. "Correspondence" shall be construed broadly and shall mean letters; all recordings, transcriptions, and notes of telephone calls or conversations; inter-office and intra-office memoranda; telegrams; telex messages; notes; and reports.

6. "Document" means any handwritten, typed, printed, graphic, photographic, mechanically recorded, computer stored, filmed, or other verbal or pictorial matter of whatever character, however produced or reproduced, of any kind and description. "Document" shall also mean every copy of a document when such copy is not an identical duplicate of the original.

7. "QA/QC" refers to the VEGP quality assurance and quality control programs and functions.

8. "Contention No. 8, as admitted by the Board" shall mean your Contention No. 8, as restated by the Atomic Safety and Licensing Board in this proceeding, which is as follows:

Applicants have not and will not implement a quality assurance program for Plant Vogtle for welding, for properly documenting the placement of concrete, for adequately testing concrete, for the preparation of correct concrete quality test records, for procuring material and equipment that meet applicable standards, for protecting equipment and for taking corrective action as required, so as to adequately provide for the safe functioning of diverse structures, systems and components, as required by 10 CFR Part 50, Appendix B, such that reasonable assurance exists that operation of the facility will not endanger the public health and safety.

9. "Contention No. 8 activities" shall mean:

- a) welding;
- b) documenting the placement of concrete;
- c) testing concrete;
- d) preparation of concrete quality test records;
- e) procuring material and equipment;
- f) protecting equipment; and
- g) taking corrective action in response to Notices of Violation as required by the NRC.

10. If any Interrogatory calls for a yes or no answer, or calls for you to cite evidence upon which you rely, and you choose merely to incorporate prior documents

in response to that Interrogatory, Applicants will interpret your response as a statement that you have no evidence to support or prove your allegation other than the evidence specifically cited in the document which is incorporated.

11. Many of these Interrogatories contain separate sub-parts (a), (b), (c), etc. You are required to answer each sub-part separately.

II. INTERROGATORIES

In answering each interrogatory, please recite the interrogatory before providing the response.

A. Specific Interrogatories

Contention 8 (Quality Assurance)

1. PROCUREMENT:

8.1-17

In response to Interrogatory Number 8.1-1, you stated: "anonymous allegations of file doctoring suggests that vendors were not qualified on the basis of the 'quality assurance' program at Vogtle but rather on the basis of past work with the Applicants." State by answering yes or no:¹

¹ Please carefully read and comply with the preceding enumerated Paragraph 10 of the Instructions set forth at page 4, above.

(a) Do you contend that it is improper to select vendors on the basis of past work if that vendor also has an effective quality assurance program?

(b) Are you capable of identifying any specific vendor who does not have an effective quality assurance program at VEGP?

(c) Are you capable of identifying any specific allegation, anonymous or otherwise, of "file doctoring"?

8.1-18

If your response to Interrogatory 8.1-17(b) is "yes", identify each vendor whom you contend did not have an effective quality assurance program.

8.1-19

If your response to Interrogatory 8.1-17(b) is "yes", answer Interrogatory 8.1-1(a).

8.1-20

If your response to Interrogatory 8.1-17(c) is "yes," state the substance of each such allegation, the date the allegation was first made known to you, how the allegation was first made known to you, whether the allegation was in writing or verbal, and, the source of the allegation.

8.1-21

When you refer to "anonymous allegations" in Response to Interrogatory 8.1-1, do you mean: (1) that the

² Please carefully read and comply with the preceding enumerated Paragraph 11 of the Instructions set forth at page 5, above.

individual(s) making the allegation or statement is unknown to you and that you are incapable of giving any identifying information with regard to that person(s); or, (2) you are capable of identifying the individual(s) but refuse to share the identify of the individual(s) with the Applicants in response to this discovery based upon a claim of privilege or other objection?

8.1-22

If you are capable of identifying the individual[s] referred to in the preceding interrogatory, respond to Interrogatory 8.1-1(b).

8.1-23

In response to Interrogatory Number 8.1-1, you have incorporated allegations set forth in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia", dated April 11, 1984 (hereinafter "CPG's Supplement to Petition") and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories", dated December 19, 1984 (hereinafter "CPG/GANE Response to NRC Staff's Second Interrogatories"). Specifically identify each document¹ which you will introduce at the time of hearing before the ASLB and identify each

¹ Please carefully read and comply with the preceding enumerated Paragraph 1 of the Instructions set forth at page 2, above.

witness⁴ whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.1-1.

8.1-24

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.1-25

In response to Applicants' Interrogatory Number 8.1-1, you have stated that: "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "There is no such additional information" or by incorporating your prior response to Interrogatory 8.1-1.

⁴ Please carefully read and comply with the preceding enumerated Paragraph 2 of the Instructions set forth at page 3, above.

8.1-26

In response to Interrogatory Number 8.1-2, you have stated that "[b]reakdowns in the Applicants' method of selecting qualified vendors could result in unsafe and uncorrected conditions at Plant Vogtle. [emphasis added]." Respond by answering yes or no to Interrogatory 8.1-2 which asks: "Do you contend that Applicants' method of approving qualified vendors has resulted in any unsafe and uncorrected condition at VEGP? [emphasis added.]"

8.1-27

If your response to the preceding Interrogatory is "yes," answer Interrogatory 8.1-2 subparts (a), (b), (c) and (d).

8.1-28

In response to Applicants' Interrogatory Number 8.1-2, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.1-2.

8.1-29

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's

Response to NRC Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.1-30

In response to Applicants' Interrogatory Number 8.1-2, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.1-31

In response to Interrogatory Number 8.1-4, you have stated: "[a]nonymous informants have alleged that the Applicants fail to audit their vendors adequately." Respond by answering yes or no: are you capable of identifying any specific allegation (anonymous or otherwise) that "the applicants failed to audit their vendors adequately" as referred to in response to Interrogatory 8.1-4?

8.1-32

If your response to the preceding Interrogatory is "yes", state the substance of each such allegation and

further state: the date the allegation was first made known to you, how the allegation was first made known to you, whether the allegation was in writing or verbal and the source of the allegation.

8.1-33

When you refer to "anonymous informants" as used in response to Interrogatory 8.1-4, do you mean: (1) that the individual making the allegation or statement is unknown to you and that you are incapable of giving any identifying information; or (2) you are capable of identifying the individual but refuse to share the identity of the individual with Applicants based upon a claim of privilege or other objection?

8.1-34

In response to Applicants' Interrogatory Number 8.1-4, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.1-4.

8.1-35

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's

Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.1-36

In response to Applicants' Interrogatory Number 8.1-4, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.1-37

In response to Applicants' Interrogatory Number 8.1-5, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.1-5.

8.1-38

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's

Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.1-39

State by answering yes or no whether you are presently capable of responding to Interrogatory 8.1-7.

8.1-40

If your response to the preceding Interrogatory is "yes", respond to Interrogatory 8.1-7.

8.1-41

State by answering yes or no whether you are presently capable of responding to Interrogatory 8.1-8.

8.1-42

If your response to the preceding Interrogatory is "yes", provide a response to Interrogatory 8.1-8.

8.1-43

State by answering yes or no whether you are presently capable of providing a response to Interrogatory 8.1-9 subparagraphs (a), (b), and (c).

8.1-44

If your answer to the preceding Interrogatory is "yes," respond to Interrogatories 8.1-9(a), (b) and (c).

8.1-45

In response to Interrogatory Number 8.1-9, you have incorporated allegations set forth in CPG's Supplement to

Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.1-9.

8.1-46

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.1-47

In response to Applicants' Interrogatory Number 8.1-9, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance. Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.1-48

In response to Applicants' Interrogatory Number 8.1-11, you have incorporated allegations set forth in

CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.1-11.

8.1-49

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.1-50

In response to Applicants' Interrogatory Number 8.1-11, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

2. WELDING:

8.2-20

In response to Applicants' Interrogatory Number 8.2-1, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.2-21

In response to Interrogatory Number 8.2-1, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-1.

8.2-22

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings

identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-23

Respond by answering yes or no: Do you contend that the cracking in the containment pipe rack welds is presently an uncorrected condition at VEGP?

8.2-24

Respond by answering yes or no: Do you have any knowledge of the facts and circumstances surrounding the cracking in the containment pipe rack welds other than that which is set forth in the letter from D.O. Foster to James P. O'Reilly dated October 17, 1984, which is referred to in Response to Interrogatory 8.2-1?

8.2-25

If your reply to the preceding interrogatory is "yes," answer fully interrogatory 8.2-1 including its subparts.

8.2-26

Identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of your allegation that the cracking in the containment pipe rack welds evidences a deficiency in the quality assurance program at VEGP.

8.2-27

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-28

In response to Interrogatory 8.2-3 you have stated "[a]ll Notices of Violation relate to implementing the required test procedures for welds." Do you mean that you do not rely in support of your Contention No. 8 upon any Notices of Violations which relate to any other aspect of the construction of VEGP (i.e. concrete, procurement, failure to take corrective action, welding procedures which do not relate to testing the welds)?

8.2-29

If your answer to the preceding interrogatory is "no", please respond to Interrogatory 8.2-3 and limit your response to the question which is asked in Interrogatory 8.2-3.

8.2-30

In response to Applicants' Interrogatory Number 8.2-3, you have stated that "Intervenors will provide further information if warranted following review of Applicants'

responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.2-31

In response to Interrogatory Number 8.2-3, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-3.

8.2-32

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-33

In response to Applicants' Interrogatory Number 8.2-4, you have stated that "Intervenors will provide further

information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.2-34

In response to Interrogatory Number 8.2-4, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-4.

8.2-35

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-36

In response to Interrogatory 8.2-5 you state "[w]elding deficiencies in containment liner penetrations are fundamentally dangerous." Please respond by stating yes or no whether you contend any deficiency involving welds in containment liner penetrations has resulted in any uncorrected deficient condition at VEGP?

8.2-37

If your answer to the preceding interrogatory is "yes", respond to Interrogatory 8.2-5.

8.2-38

In response to Applicants' Interrogatory Number 8.2-5, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.2-39

In response to Interrogatory Number 8.2-5, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document

which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-5.

8.2-40

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-41

Please state by answering yes or no whether you are presently capable of responding to Interrogatory 8.2-6.

8.2-42

If you are presently capable of responding to Interrogatory 8.2-6, respond to that Interrogatory by answering yes or no.

8.2-43

In response to Interrogatory Number 8.2-6, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the

time of hearing in support of the allegations set forth in response to Interrogatory 8.2-6.

8.2-44

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-45

Please state by answering yes or no whether you are presently capable of responding to Interrogatory 8.2-7.

8.2-46

If you are capable of responding to Interrogatory 8.2-7, please state yes or no whether you contend any failure as alleged in Interrogatory 8.2-6 evidences a deficiency in the quality assurance program at VEGP?

8.2-47

If your response to the preceding Interrogatory is "yes", please respond to Interrogatories 8.2-7(a), (b), (c), (d) and (e).

8.2-48

In response to Interrogatory Number 8.2-7, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document

which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-7.

8.2-49

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-50

Please state by answering yes or no whether you are presently capable of responding to Interrogatory 8.2-8.

8.2-51

If you are capable of responding to Interrogatory 8.2-8, please state yes or no whether you contend that any failure as alleged in Response to Interrogatory 8.2-6 has resulted in an uncorrected deficiency at VEGP.

8.2-52

If your response to the preceding Interrogatory is "yes", please respond to Interrogatories 8.2-8(a),(b), (c),(d) and (e).

8.2-53

In response to Interrogatories 8.2-9, 8.2-10 and 8.2-11, you have stated: " . . . for example, the

August 31, 1983 notice of violation 50-424 & 425/83-16." Please answer yes or no whether this is the only instance in which you contend that Applicants failed to assure that nondestructive testing of welds was conducted consistent with applicable codes?

8.2-54

If your answer to the preceding Interrogatory is "no", state each and every other instance which you contend to support your contention that applicants failed to assure that nondestructive testing of welds was conducted consistent with applicable codes.

8.2-55

In response to Applicants' Interrogatory Number 8.2-9, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Please provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.2-56

In response to Interrogatory Number 8.2-9, you have incorporated allegations set forth in CPG's Supplement to

Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-9.

8.2-57

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-58

In response to Interrogatory 8.2-12 you have stated: "Please see the letter from James P. O'Reilly to Georgia Power, 28 September 1983 . . ." Please state yes or no whether you know of any other "allegation" made by "a Walsh Company boilermaker that improper welding and work practice had occurred" other than those allegations which are set forth in the letter from James P. O'Reilly referred to in response to Interrogatory 8.2-12.

8.2-59

If your response to the preceding Interrogatory is "yes", please fully respond to Interrogatories 8.2-12(a), (b), (c), (d) and (e).

8.2-60

In response to Applicants' Interrogatory Number 8.2-12, you stated that: "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Please provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.2-61

In response to Interrogatory Number 8.2-12, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-12.

8.2-62

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings

identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-63

In response to Interrogatory 8.2-14 you state "Applicants have repeatedly been cited by the Nuclear Regulatory Commission for inadequate welding . . ." Please state yes or no whether you know of any claim of inadequate welding other than those described in Notices of Violation received from the Nuclear Regulatory Commission.

8.2-64

If your response to the preceding Interrogatory is "yes", respond to Interrogatories 8.2-14(a), (b) and (c).

8.2-65

In response to Applicants' Interrogatory Number 8.2-13, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Please provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.2-66

In response to Interrogatory Number 8.2-13, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-13.

8.2-67

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-68

Please respond by answering yes or no whether you are aware of any instance in which Applicants have been ". . . restricting quality assurance methods to explicitly designated procedures in disregard to more comprehensive standards of engineering practice . . ." (as set forth at page 14 of your Amendment to Supplement to Petition to Intervene and for Rehearing filed May 27, 1984).

8.2-69

If your response to the preceding Interrogatory is "yes", please respond to Interrogatories 8.2-18(a),(b),(c) and (d).

8.2-70

In response to Applicants' Interrogatory Number 8.2-16, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Please provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.2-71

In response to Interrogatory Number 8.2-16, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.2-16.

8.2-72

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.2-73

In response to Interrogatory 8.2-17, you have incorporated by reference CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please cite by document and page number specifically where either of those pleadings identifies and describes the "more comprehensive standards of engineering practice" which should have been followed, as requested in Interrogatory 8.2-17.

8.2-74

In response to Interrogatory 8.2-19, you have stated "yes. Please see relevant responses above." However, you have also stated that you ". . . have not and will not inspect Applicants' welds." (See Response to Interrogatory 8.2-18.) Please respond by answering yes or no whether you know of any particular weld at VEGP which is presently unsafe.

8.2-75

If your response to the preceding Interrogatory is "yes", please respond to Interrogatories 8.2-19(a), (b), (c) and (d).

3. CONCRETE:

8.3-13

In response to Applicants' Interrogatory Number 8.3-4, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.3-14

In response to Applicants' Interrogatory Number 8.3-4, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.3-4.

8.3-15

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.3-16

In response to Applicants' Interrogatory Number 8.3-5, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.3-17

In response to Applicants' Interrogatory Number 8.3-5, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you

will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.3-5.

8.3-18

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.3-19

Respond by answering yes or no whether you know of any testing (adequate or inadequate) of lifting eyes of concrete covers.

8.3-20

If your answer to the preceding Interrogatory is "yes," please identify each document upon which you rely in support of your contention that the testing of concrete covers was inadequate.

8.3-21

If your response to Interrogatory 8.3-19 is "yes," please identify each witness upon which you rely in support of your contention that the testing of lifting eyes of concrete covers was inadequate.

8.3-22

In response to Applicants' Interrogatory Number 8.3-6, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.3-6.

8.3-23

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.3-24

In response to Applicants' Interrogatory Number 8.3-6, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality

assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.3-25

Please state by answering yes or no whether you contend that any test of lifting eyes of concrete hatch covers has resulted in any uncorrected deficient condition at VEGP.

8.3-26

If your response to the preceding Interrogatory is "yes," respond fully and completely to Interrogatories 8.3-7(a),(b),(c),(d),(e),(f) and (g).

8.3-27

Please respond by answering yes or no whether you are aware of any allegations made by former or present employees of inadequate concrete QC testing and/or falsification of QC test records other than those allegations which are referred to and discussed in I & E Report 83-06 (the July 1981/October 1982 SALP).

8.3-28

If your answer to the preceding Interrogatory is "yes," please respond fully and completely to Interrogatories 8.3-8(a),(b),(c) and (d).

8.3-29

In response to Applicants' Interrogatory Number 8.3-8, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.3-8.

8.3-30

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.3-31

In response to Applicants' Interrogatory Number 8.3-8, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by

stating: "Joint Intervenors have no such additional information."

8.3-32

Please respond by answering yes or no whether there is any basis for your contention that "Applicants' QA/QC program has been inadequate with regard to properly documenting the placement of concrete" other than the facts and circumstances which are discussed in I & E Report 83-06 (the July 1981-October 1982 SALP).

8.3-33

If your response to the preceding Interrogatory is "yes," please respond fully and completely to Interrogatory 8.3-10(a),(b),(c) and (d).

8.3-34

In response to Applicants' Interrogatory Number 8.3-10, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.3-10.

8.3-35

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's

Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.3-36

In response to Applicants' Interrogatory Number 8.3-10, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.3-37

Please respond by answering yes or no whether you have any basis for your contention "that Applicants' QA/QC program has been inadequate with regard to testing of concrete," other than that which is specifically described in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories.

8.3-38

If your answer to the preceding Interrogatory is "yes," respond in full to Interrogatories 8.3-11(a), (b), (c) and (d).

8.3-39

In response to Applicants' Interrogatory Number 8.3-11, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.3-11.

8.3-40

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.3-41

In response to Applicants' Interrogatory Number 8.3-11, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants'

Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.3-42

Please respond by answering yes or no whether you are aware of any basis for your contention that "Applicants' QA/QC program has been inadequate with regard to preparation of correct concrete quality test records" other than that which is set forth in CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories.

8.3-43

If your response to the preceding Interrogatory is "yes," please respond to Interrogatory 8.3-12(a),(b),(c) and (d).

8.3-44

In response to Applicants' Interrogatory Number 8.3-12, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.3-12.

8.3-45

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.3-46

In response to Applicants' Interrogatory Number 8.3-12, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.3-47

Please state by responding yes or no whether you are presently capable of answering Interrogatories 8.3-13(a), (b), (c), (d) and (e).

8.3-48

If your response to the preceding Interrogatory is "yes," provide a response to Interrogatory 8.3-13, including its subparts.

8.3-49

In response to Applicants' Interrogatory Number 8.3-13, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.3-13.

8.3-50

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.3-51

In response to Applicants' Interrogatory Number 8.3-13, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact

by stating: "Joint Intervenors have no such additional information."

8.3-52

In response to Interrogatory No. 5 of NRC Staff's Second Interrogatories, you have stated, inter alia, "there are voids in the auxiliary building concrete." Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegation that "there are voids in the auxiliary building concrete."

8.3-53

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NPC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

4. EQUIPMENT PROTECTION:

8.4-9

In response to NRC Staff's Second Interrogatories, you stated: "In 1974, the Georgia Power QA manual did not adequately describe the QA program for . . . procurement." Identify specifically and with detail each and every deficiency which you contend related to the QA manual for procurement in 1974.

8.4-10

If your response to the preceding Interrogatory merely incorporates the allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories, state specifically by line and page where those documents specify the purported deficiency in the QA manual with regard to procurement.

8.4-11

In response to Applicants' Interrogatory Number 8.4-1, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.4-1.

8.4-12

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.4-13

In response to Applicants' Interrogatory Number 8.3-13, you have stated that "Intervenors will provide

further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.4-14

Respond by stating yes or no whether you are aware of any basis for the contention that Applicants' "method of equipment storage at VEGP evidences a deficiency in the quality assurance program at VEGP" other than facts and circumstances which are described at I & E Report 83-06 (the July 1981-October 1982 SALP).

8.4-15

If your response to the preceding Interrogatory is "yes," please respond specifically to Interrogatories 8.4-1(a),(b),(c),(d) and (e).

8.4-16

In response to Interrogatory 8.4-3, you stated "Intervenors have not personally inspected the electrical cabinets on site." Please respond by answering yes or no whether you have any knowledge of facts or circumstances regarding damage done to any electrical cabinets on site.

8.4-17

If your response to the preceding Interrogatory is "yes," please respond to Interrogatories 8.4-3(a),(b), (c),(d),(e), and (f).

8.4-18

At page 13 of CPG/GANE's Response to Applicants' Second Set of Interrogatories and Request for Production of Documents, you purport to answer Interrogatory 8.4-5 and yet there is a response to Interrogatory 8.4-5 also appearing on page 14 of your response. Please state by answering yes or no whether your response no. 8.4-5 which begins at page 13 is actually intended as your response to 8.4-4.

8.4-19

If your response to the preceding Interrogatory is "no," please provide a response to Interrogatory No. 8.4-4.

8.4-20

In response to Applicants' Interrogatory Number 8.4-5, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.4-5.

8.4-21

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.4-22

In response to Applicants' Interrogatory Number 8.4-4, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.4-23

In response to Applicants' Interrogatory Number 8.4-5, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.4-5.

8.4-24

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.4-25

In response to Applicants' Interrogatory Number 8.4-5, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.4-26

In response to Applicants' Interrogatory Number 8.4-6, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.4-6.

8.4-27

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.4-28

In response to Applicants' Interrogatory Number 8.4-6, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.4-29

In response to Applicants' Interrogatory Number 8.4-7, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.4-7.

8.4-30

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.4-31

In response to Applicants' Interrogatory Number 8.4-7, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.4-32

In response to Applicants' Interrogatory Number 8.4-8, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.4-8.

8.4-33

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.4-34

In response to Applicants' Interrogatory Number 8.4-8, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

5. CORRECTIVE ACTION:

8.5-4

Please answer by responding yes or no whether CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories sets forth any specific instance in which Applicants have failed to take corrective action as alleged in Contention No. 8.

8.5-5

If your response to the preceding Interrogatory is "yes," please specify by pleading and by page number each time you have described the specific instance to which you refer.

8.5-6

If your response to Interrogatory 8.5-4 is "yes," please respond to Interrogatory 8.5-1(a),(b),(c) and (d).

8.5-7

In response to Applicants' Interrogatory Number 8.5-1, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.5-1.

8.5-8

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.5-9

In response to Applicants' Interrogatory Number 8.5-8, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.5-10

In response to Applicants' Interrogatory Number 8.5-2, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.5-2.

8.5-11

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.5-12

In response to Applicants' Interrogatory Number 8.5-2, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.5-13

In response to Interrogatory 8.5-3, you have stated "yes," that Applicants' failure to take corrective action in response to any Notice of Violation has resulted in an unsafe and uncorrected condition at VEGP. In support of that accusation, you have incorporated allegations described in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories.

Please now respond by answering yes or no whether CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories sets forth any fact or circumstance upon which you rely in support of your contention that Applicants' failure to take corrective action in response to any notice violation has resulted in an unsafe and uncorrected condition at VEGP.

8.5-14

If your response to the preceding Interrogatory is "yes," specify by document and page number each and every reference to the allegation that Applicants' failure to take corrective action in response to any notice of violation has resulted in an unsafe and uncorrected condition at VEGP.

8.5-15

In response to Applicants' Interrogatory Number 8.5-3, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.5-3.

8.5-16

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.5-17

In response to Applicants' Interrogatory Number 8.5-3, you have stated that "Intervenors will provide further

information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

6. GENERAL:

8.6-32

In response to Interrogatory 8.6-1, you have incorporated by reference CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state by answering yes or no whether either of these two documents identifies each violation by Applicant to NRC regulations, rules or other requirements which violation(s) you contend involved a Contention No. 8 activity, as referred to in Interrogatory 8.6-1.

8.6-33

If your response to the preceding Interrogatory is "yes," please specify by document and page number where either of the two documents incorporated in response to Interrogatory 8.6-1 identifies any violation by Applicants of NRC regulations, rules or other requirements which violation(s) you contend involved a Contention No. 8 activity.

8.6-34

In response to Applicants' Interrogatory Number 8.6-1, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-1.

8.6-35

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-36

In response to Applicants' Interrogatory Number 8.6-1, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-37

In response to Interrogatory 8.6-2, you incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state yes or no whether either of these two documents identifies each violation of NRC regulations by Applicants in the construction methods (which violation relates to a Contention No. 8 activity) which you contend undermines the confidence and capability of the coolant and containment systems to perform their essential tasks.

8.6-38

If your response to the preceding Interrogatory is "yes," please specify by document and page number where either of the two documents incorporated is responsive to Interrogatory 8.6-2.

8.6-39

In response to Applicants' Interrogatory Number 8.6-2, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-2.

8.6-40

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-41

In response to Applicants' Interrogatory Number 8.6-2, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-42

In response to Interrogatory 8.6-3 you have incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state yes or no whether either of these two documents explains the basis for your contention that a violation referred to in response to Interrogatory 8.6-3 has adversely affected or evidences a deficiency in the quality assurance program at VEGP.

8.6-43

If your response to the preceding Interrogatory is "yes," please specify by document and page number where either of the two documents incorporated in response to Interrogatory 8.6-3 responds to Interrogatory 8.6-3.

8.6-44

In response to Applicants' Interrogatory Number 8.6-3, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-3.

8.6-45

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-46

In response to Applicants' Interrogatory Number 8.6-3, you have stated that "Intervenors will provide further information if warranted following review of Applicants'

responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-47

Respond to Interrogatory 8.6-4.

8.6-48

In response to Interrogatory 8.6-5 you have stated: "If workers were adequately trained, the problems should not have occurred." Please identify specifically the "problems" to which you refer.

8.6-49

In response to Interrogatory 8.6-5, you have incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state yes or no whether either of these two documents addresses the questions raised in Interrogatories 8.6-5(a),(b),(c) and (d).

8.6-50

If your response to the preceding Interrogatory is "yes," please specify by document and page number where either of those documents are responsive to Interrogatory 8.6-5(a),(b),(c) and (d).

8.6-51

In response to Applicants' Interrogatory Number 8.6-5, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-5.

8.6-52

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-53

In response to Applicants' Interrogatory Number 8.6-5, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-54

Please respond to Interrogatory 8.6-7.

8.6-55

If your response to Interrogatory 8.6-7 incorporates either CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, please specify by document and page number where either of those documents is responsive to Interrogatory 8.6-7.

8.6-56

Specifically identify each document which you will introduce at the time of hearing for the ASLB upon which you which rely in support of your contention that any procedure has been changed because workers were unable to comply with original procedures.

8.6-57

Specifically identify each witness whom you will call at the time of hearing before the ASLB in support of your contention that any procedure has been changed because workers were unable to comply with original procedures.

8.6-58

Please respond to Interrogatory 8.6-8.

8.6-59

If your response to Interrogatory 8.6-8 incorporates either CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, please specify by

document and page number where either of those documents is responsive to Interrogatory 8.6-8.

8.6-60

Please respond to Interrogatory 8.6-9.

8.6-61

If your response to Interrogatory 8.6-9 incorporates either CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, please specify by document and page number where either of those documents is responsive to Interrogatory 8.6-9.

8.6-62

In response to Interrogatory 8.6-11, you have incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state by answering yes or no whether either of these documents specifically identifies any "failure" to which you refer when you allege (at page 17 of CPG's Supplement to Petition) that "[t]he number of past and continuing failures . . . indicates an undue risk to health and safety of the public."

8.6-63

If your answer to the preceding Interrogatory is "yes," please specify by document and page number where either of those documents is responsive to the questions asked in Interrogatory 8.6-11, including its subparts.

8.6-64

In response to Applicants' Interrogatory Number 8.6-11, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-11.

8.6-65

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-66

In response to Applicants' Interrogatory Number 8.6-11, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact

by stating: "Joint Intervenors have no such additional information."

8.6-67

In response to Interrogatory 8.6-12, you have incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state by answering yes or no whether either of these two documents addresses the specific questions raised in Interrogatory 8.6-12, including its subparts.

8.6-68

If your response to the preceding Interrogatory is "yes," please specify by document and page number where either of those two documents incorporated in response to Interrogatory 8.6-12 is responsive to any of the questions raised in Interrogatory 8.6-12, including its subparts.

8.6-69

In response to Applicants' Interrogatory Number 8.6-12, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-12.

8.6-70

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-71

In response to Applicants' Interrogatory Number 8.6-12, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-72

In response to Interrogatory 8.6-13, you have objected to providing the names of the individuals requested ". . . on the grounds that it is a violation of privacy of individuals who may have spoken to Intervenors." Please respond by answering yes or no to each of the following subparts:

- (a) Do you plan to reveal the names of those individuals at the time of hearing before the ASLB;
- (b) Do you plan to use, at the time of hearing before the ASLB, the substance of any information or allegation provided by any such individual;
- (c) Do you plan to call any such individual as a witness at the time of hearing before the ASLB.

8.6-73

State the substance of any testimony you will solicit from any witness at the time of hearing before the ASLB (whether the witness wishes to remain anonymous or not) which testimony will relate to interrogatory 8.6-13.

8.6-74

In response to Interrogatory 8.6-13 you have objected to identifying the individuals requested ". . . on the grounds that it is a violation of privacy of individuals who may have spoken to Intervenors." Please respond by answering yes or no whether you have inquired of those individuals whether they would allow you to identify them to Applicants in response to this discovery.

8.6-75

In response to Interrogatory 8.6-15 you have incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state by responding yes or no whether there are any other facts or

circumstances upon which you rely in support of Contention No. 8 other than those which are specifically described in CPG's Supplement to Petition and in response to NRC Staff's Second Interrogatories.

8.6-76

If your response to the preceding Interrogatory is "yes," please respond to Interrogatory 8.6-15.

8.6-77

In response to Applicants' Interrogatory Number 8.6-15, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-15.

8.6-78

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-79

In response to Applicants' Interrogatory Number 8.6-15, you have stated that "Intervenors will provide

further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-80

In response to Interrogatory 8.6-16 you have incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state by responding yes or no whether there are any other facts or circumstances upon which you rely in support of Contention No. 8 other than those which are specifically described in the CPG's Supplement to Petition and in response to NRC Staff's Second Interrogatories.

8.6-81

If your response to the preceding Interrogatory is "yes," please respond to Interrogatory 8.6-16.

8.6-82

In response to Applicants' Interrogatory Number 8.6-16, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify

each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-16.

8.6-83

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-84

In response to Applicants' Interrogatory Number 8.6-16, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-85

In response to Interrogatory 8.6-17, you stated: "It depends upon the reasons behind the specific Stop Work

Orders. . . ." Please respond by answering yes or no whether you have any knowledge of any of the reasons behind any of the Stop Work Orders at VEGP.

8.6-86

If your response to the preceding Interrogatory is "yes," please respond to Interrogatory 8.6-17, including its subparts.

8.6-87

Please respond by answering yes or no whether you contend that there has been any failure at VEGP to issue a Stop Work Order when needed.

8.6-88

If your response to the preceding Interrogatory is "yes," please explain in detail the basis for your allegation and include within your explanation:

- (a) the Stop Work Order to which you refer;
- (b) the particular work to which it was or should have been directed;
- (c) the date it was or should have been issued;
- (d) the manner in which it affected the QA program;
- (e) the identify of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- (f) the identification of any document upon which you rely in support of your contention or explanation.

8.6-89

Respond by stating yes or no whether you contend that any corrective action following the issuance of a Stop Work Order has been inadequate prior to resumption of work.

8.6-90

If your response to the preceding Interrogatory is "yes," please explain in detail the basis for such contention and include within your explanation:

- (a) the Stop Work Order to which you refer;
- (b) the particular work to which it was directed;
- (c) the date it was issued;
- (d) the corrective action which should have been taken;
- (e) the corrective action which was, in fact, taken (if any);
- (f) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- (g) the identification of any document upon which you rely in support of your contention or explanation.

8.6-91

If your response to Interrogatory 8.6-88 or 8.6-90 incorporates either CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, please specify by document and page number where either of

these documents incorporated in response to these Interrogatories is responsive to the Interrogatories.

8.6-92

In response to Interrogatory 8.6-19, you stated: "It depends upon the reasons for the deviations." State by answering yes or no whether you have any knowledge of the reasons for any of the deviations from original design specifications or procedures at VEGP.

8.6-93

If your response to the preceding Interrogatory is "yes," please respond to Interrogatory 8.6-19, including its subparts.

8.6-94

If your response to Interrogatory 8.6-92 incorporates either CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those two documents is responsive to that Interrogatory or Interrogatory 8.6-19.

8.6-95

In response to Interrogatory 8.6-22, you have incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Please state yes or no whether either of these two documents explains the basis for your statement which is quoted in Interrogatory 8.6-22.

8.6-96

If your response to the preceding Interrogatory is "yes," please specify by document and page number where either of these two documents is responsive to Interrogatory 8.6-22.

8.6-97

In response to Applicants' Interrogatory Number 8.6-22, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-22.

8.6-98

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-99

In response to Applicants' Interrogatory Number 8.6-22, you have stated that "Intervenors will provide further information if warranted following review of

Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-100

In response to Interrogatory 8.6-23, you have incorporated CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. State yes or no whether either of these two documents identifies any vendor or contractor or subcontractor who has failed to comply with any quality assurance requirements within the scope of your Contention No. 8.

8.6-101

If your response to the preceding Interrogatory is "yes," specifically describe by document and page number where either of these two documents is responsive to Interrogatory 8.6-23.

8.6-102

In response to Applicants' Interrogatory Number 8.6-23, you have incorporated allegations set forth in CPG's Supplement to Petition and CPG/GANE's Response to NRC Staff's Second Interrogatories. Specifically identify

each document which you will introduce at the time of hearing before the ASLB and identify each witness whom you will call at the time of hearing in support of the allegations set forth in response to Interrogatory 8.6-23.

8.6-103

If your response to the preceding interrogatory re-incorporates CPG's Supplement to Petition or CPG/GANE's Response to NRC Staff's Second Interrogatories, specify by document and page number where either of those pleadings identifies documentary evidence or witnesses such that it is responsive to the preceding interrogatory.

8.6-104

In response to Applicants' Interrogatory Number 8.6-23, you have stated that "Intervenors will provide further information if warranted following review of Applicants' responses to Intervenors' 'Third Set of Interrogatories and Request to Produce' and the Applicants' Responses to Intervenors' follow-up questions concerning quality assurance." Provide such further information. If you have no such further information, indicate that fact by stating: "Joint Intervenors have no such additional information."

8.6-105

In response to Interrogatory 8.6-24, you have objected on the grounds that "[t]o fully respond would be unduly

burdensome." How many individuals have you spoken to who fall within the description of Interrogatory 8.6-24?

8.6-106

In response to Interrogatory 8.6-24, you have objected on the grounds that a response "would violate the privacy of individuals who may have communicated with Intervenors . . ." Please respond by answering yes or no to each of the following subparts:

- (a) Do you plan to reveal the names of those individuals at the time of hearing before the ASLB;
- (b) Do you plan to use, at the time of hearing before the ASLB, the substance of any information or allegation provided by any such individual;
- (c) Do you plan to call any such individual as a witness at the time of hearing before the ASLB.

8.6-107

State the substance of any testimony you will solicit from any witness at the time of hearing before the ASLB (whether the witness wishes to remain anonymous or not) which testimony will relate to interrogatory 8.6-24.

8.6-108

Please respond by answering yes or no whether you are presently capable of identifying any person who fits the description set forth in Interrogatory 8.6-24.

8.6-109

Please state by answering yes or no whether you are capable of responding to Interrogatory 8.6-25, even though you refuse to respond to the Interrogatory on a claim of privilege.

8.6-110

Please respond by answering yes or no whether you have had any communication with Governmental Accountability Project concerning the quality assurance program at VEGP.

8.6-111

Please state by answering yes or no whether you have any communication with Union of Concerned Scientists concerning the quality assurance program at VEGP.

8.6-112

In response to Interrogatory 8.6-26, and Interrogatory 8.6-27, you have objected to answering partially on the grounds that ". . . it violates privacy . . . [and] . . . violates constitutional rights" Please respond by answering yes or no whether you plan to reveal their names or use their testimony at a hearing before the ASLB on your Contention No. 8.

8.6-113

With regard to any communication with Government Accountability Project or Union of Concerned Scientists which you might have had, have you consulted with either

of those organizations to determine whether they object to your identifying that communication to Applicants in response to Interrogatory 8.6-26 or 8.6-27?

8.6-114

In response to Interrogatory 8.6-29, you have stated: "Intervenors will make available all documents used in formulating these responses, with the exception of those which might violate privacy." Applicants, through their counsel, have now reviewed the documents produced by Intervenors on Wednesday, February 20, 1985. None of those documents describe the Interrogatory response to which the document pertained nor is your answer to Interrogatory 8.6-28 responsive to this aspect of the Interrogatory. Please identify, by document description,⁵ the Interrogatory response to which the document which has been produced pertains.

8.6-115

In response to Interrogatory 8.6-29, you have not identified or produced any document which "might violate privacy." Please identify each document which has been withheld from production on the ground that it "might violate privacy."

⁵ Please carefully read and comply with the preceding enumerated Paragraph 1 of the instructions set forth on page 2 above.

8.6-116

In response to Interrogatory 8.6-30, you have stated: "These responses were prepared in their entirety by Doug Teper and Tim Johnson." Please respond by answering yes or no whether either Mr. Teper or Mr. Johnson consulted any other person in forming their response to any Interrogatory set forth herein or in Applicants' Second Interrogatories.

8.6-117

If your response is "yes", please respond to Interrogatory 8.6-30.

8.6-118

Identify each and every person who has provided information or with whom you have consulted in forming your response to any of the preceding Interrogatories and with regard to each person identified, please state the response to which that person was consulted or provided information.

8.6-119

To the extent you have not done so already in response to any particular Interrogatory, identify each document which you have consulted in formulating your response, or which relates to your response, to any of the preceding Interrogatories and describe the Interrogatory response to which the document pertains.

8.6-120

Respond to Interrogatory 8.6-31.

8.6-121

Identify each document upon which you will rely at the time of hearing in support of your Contention No. 8.

8.6-122

Identify each witness whom you will call in support of your Contention No. 8 at the time of hearing before the ASLB.

8.6-123

State the substance of any testimony you will solicit from any witness at the time of hearing before the ASLB (whether the witness wishes to remain anonymous or not).

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that Intervenors respond in writing to the following requests for production of documents and produce or make available for inspection and copying at a designated location the original and each copy of the documents requested below that are in possession, custody or control of Intervenors.

The document shall be deemed to be within the "control" of Intervenors if Intervenors have ownership, possession or custody of the document or a copy thereof or have the right to secure the document or copy thereof from

any person or public or private entity having physical possession thereof.

The instructions and definitions set forth in Part I of these Interrogatories and Request for Production of Documents are also applicable to this Request for Production of Documents.

Documents Requested

8-47. Each and every document which has been received by Legal Environment Assistance Foundation in response to a freedom of information request made to the Nuclear Regulatory Commission pertaining to documents regarding the adequacy of the core cooling system of Vogtle Nuclear Power Plant.

8-47. Any document upon which you have relied or which relates to your response to any of the preceding Interrogatories.

8-49. Each and every document upon which you will rely at the time of hearing before the ASLB in support of your Contention No. 8.

Respectfully submitted,

James E. Joiner

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Kevin C. Greene
Hugh M. Davenport
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Counsel for Applicants

Dated: March 5th, 1985

