

I-MOSBA-39A

NUCLEAR REGULATORY COMMISSION

Docket No. 50-424/425-OLA-3

EXHIBIT NO. II-39A

In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2

☐ Staff ☐ Applicant ☒ Intervenor ☐ Other

DOCKETED

☐ Received☐ Rejected

Reporter

5b

Date Filed

Witness

LIST OF EXHIBITS

'95 OCT 26 P4:38

Exhibit
No.

Description

- 1 Request for Investigation, dated November 1, 1990, from Stewart D. EBNETER, Regional Administrator, Region II, NRC.
- 2 Addendum to Request for Investigation, with attachments, dated June 19, 1991, from Regional Administrator, Region II, NRC.
- 3 Computer printout alleging false statements, by Georgia Power Company (GPC) to NRC, regarding Emergency Diesel Generator testing, undated, prepared by Allen L. MOSBAUGH, former Acting Assistant General Manager for Plant Support, Plant Vogtle, GPC, and provided by MOSBAUGH to NRC on June 14, 1990.
- ④ 4 Copy of NRC Letter, entitled SUBJECT: CONFIRMATION OF ACTION LETTER, to GPC (Hairston), dated March 23, 1990.
- 5 Transcripts of Interview of MOSBAUGH, dated July 18 and 19, 1990.
- 6 Transcript of Interview of MOSBAUGH, dated November 4, 1993.
- 7 Copy of "Diesel Testing" transparency presented to NRC on April 9, 1990, by George BOCKHOLD, Jr., former General Manager, Plant Vogtle, GPC.
- 8 Copy of "Quarantined Components" transparency presented to NRC by BOCKHOLD on April 9, 1990.
- 9 Transcript of Interview of Jimmy Paul CASH, former Operations Supervisor, Plant Vogtle, GPC, dated August 14, 1990.
- 10 Transcript of Interview of CASH, dated June 14, 1993.
- 11 Copy of computer printout, undated, identified by CASH as being representative of his handwritten list of Diesel Start entries obtained from the Vogtle, Unit 1, Control Log and Shift Supervisor's Log, which he provided to BOCKHOLD as part of BOCKHOLD's preparation for the April 9, 1990 presentation to NRC.
- 12 Transcript of Interview of BOCKHOLD, dated August 14, 1990.
- 13 Transcript of Interview of BOCKHOLD, dated June 22, 1993, with exhibits.
- * 14 Transcript of Interview of Kenneth S. BURR, Senior Project Engineer, Southern Nuclear Company (SNC), dated June 14, 1993, with exhibits.
- 15 Plant Vogtle, Unit 1, Control Log, for period March 20, 1990 - April 9, 1990.

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II-39A

<u>Exhibit No.</u>	<u>Description</u>
16	Copies of DIESEL GENERATOR START LOG (from VEGP Procedure No. 55038-C), from train B, Unit 1, for the period 2-16-90 (Start No. 1-90-114) through 5-23-90 (Start No. 1-90-161).
17	Copies of Diesel Test COMPLETION SHEETS, (from VEGP Procedure No. 13145-1) for DG1B (Diesel Generator B, Unit 1), for the period 3-13-90 through 4-19-90.
18	Report of Interview of Stewart D. EBNETER, Regional Administrator (RA), Region II (RII), NRC, dated July 17, 1991.
19	Report of Interview of Stewart D. EBNETER, RA, RII NRC, dated February 27, 1992.
20	Reports of Interview of Kenneth E. BROCKMAN, Branch Chief, Incident Response Branch, Office of Analysis and Evaluation of Operational Data (AEOD), NRC--formerly Section Chief, Vogtle Project, Division of Reactor Projects (DRP), RII, NRC; dated September 5, 1991, and August 23, 1993.
21	Report of Interview of Milton D. HUNT, Reactor Inspector, Engineering Branch, Division of Reactor Safety (DRS), RII, NRC, dated September 3, 1991.
22	Report of Interview of Peter A. TAYLOR, Reactor Inspector, Engineering Branch, DRS, RII, NRC, dated September 4, 1991.
23	Report of Interview of David B. MATTHEWS, Director, Project Directorate II-3, NRR, NRC, dated September 5, 1991.
24	Report of Interview of Leigh TROCINE, Resident Inspector, Turkey Point Nuclear Station, RII, NRC--formerly a Project Engineer, RII, NRC, dated August 30, 1991.
25	Report of Interview of Alfred E. CHAFFEE, Events Assessment Branch, Office of Nuclear Reactor Regulation (NRR), NRC--formerly Team Leader, Incident Investigation Team (IIT), NRC, for the Vogtle Site Area Emergency (SAE), dated August 28, 1991.
26	Report of Interview of Richard A. KENDALL, Senior General Engineer, Department of Energy, Germantown, MD---formerly Senior Electrical Engineer, Events Assessment Branch, NRR, NRC, dated August 28, 1991.
27	Copy of GPC Letter, entitled VOGTLE ELECTRIC GENERATING PLANT CONFIRMATION OF ACTION LETTER, to NRC (Ebneter), dated April 9, 1990.
28	Transcript of James A. BAILEY, Licensing Manager, Vogtle Project, SNC, dated June 23, 1993, with exhibits.

<u>Exhibit No.</u>	<u>Description</u>
29	Transcript of C. Kenneth McCOY, Vice-President, Vogtle Project, SNC, and V-P, GPC, dated June 30, 1993, with exhibits.
30	Transcript of N. Jackson STRINGFELLOW, Project Licensing Engineer, SNC, dated June 21, 1993.
31	Transcript of W. George HAIRSTON, III, Executive Vice President, GPC; and Chief Operating Officer, SNC, dated June 25, 1993, with exhibits.
32	Copy of Draft, dated April 19, 1990, of GPC Licensee Event Report (LER) 90-06, pertaining to the Site Area Emergency at Plant Vogtle on March 20, 1990.
33	MOSBAUGH audio tape, dated April 19, 1990, #3 (NRC #57)
34	Transcript of MOSBAUGH audio tape, (NRC #57)
35	MOSBAUGH audio tape, dated April 19, 1990, #4, (NRC #58).
36	Transcript of MOSBAUGH audio tape, (NRC #58).
37	Copy of GPC LER, No. 90-06, entitled LOSS OF OFFSITE POWER LEADS TO SITE AREA EMERGENCY, with transmittal letter, dated April 19, 1990.
38	Transcript of Interview of John G. AUFDENKAMPE, Manager, Mechanical Group, Vogtle Project, Southern Company Services (SCS) - formerly Manager, Technical Support, Plant Vogtle, GPC, dated June 16, 1993, with exhibits.
39	Transcript of William B. SHIPMAN, General Manager, Plant Support, Vogtle Project, SNC & GPC, dated June 11, 1993.
40	Transcript of Interview of Georgie R. FREDERICK, Manager, Maintenance, Plant Vogtle--formerly, Supervisor, Safety Audit and Engineering Review (SAER), Plant Vogtle, GPC, dated June 28, 1993, with exhibits.
41	Copy of Letter of Transmittal, dated June 29, 1990, to the first Revision to LER 90-06, addressed to the NRC Document Control Desk, from GPC (W. G. Hairston).
42	Transcript of Interview of Harry W. MAJORS, Licensing Project Engineer, Vogtle Project, SNC, dated June 29, 1993.
✓ 43	Copy of GPC SAER Audit of Diesel Generator Records, dated June 29, 1990.

<u>Exhibit No.</u>	<u>Description</u>
44	Copy, dated August 22, 1990, of Response to NRC Question Concerning Diesel Starts Reported on April 9, 1990 and in LER 90-06, Revisions 0 and 1.
45	Copy of Letter from GPC (Hairston, signed by McCoy) to NRC (Ebner), entitled VOGTLE ELECTRIC GENERATING PLANT CLARIFICATION OF RESPONSE TO CONFIRMATION OF ACTION LETTER, with attachments, dated August 30, 1990.
46	Copy of marked-up draft of GPC Letter to NRC, entitled VOGTLE ELECTRIC GENERATING PLANT CLARIFICATION OF RESPONSE TO CONFIRMATION OF ACTION LETTER, dated August 28, 1990.
47	Transcript of Interview of Thomas V. GREENE, Manager, Engineering and Licensing, Vogtle Project, SNC--formerly Assistant General Manager, Plant Support, Plant Vogtle, GPC, dated July 6, 1993.
48	Transcript of Interview of R. Patrick McDONALD, Executive Director, Advanced Reactor Corporation--formerly Executive Vice President, GPC and Alabama Power Company, dated July 1, 1993.
49	Letter from B. LAVINE, attorney, Troutman Sanders Law Firm, to James Y. Vorse, Field Office Director, Atlanta Field Office of Investigations, NRC, dated August 4, 1993, declining polygraph examinations on behalf of HAIRSTON, MCCOY, SHIPMAN, STRINGFELLOW, BOCKHOLD, and AUFDENKAMPE.
50	Transcript of Interview of Kenneth R. HOLMES, Manager, Training and Emergency Preparedness, VEGP, GPC, dated September 27, 1991, with exhibits.
51	Report of Interview of Christopher C. ECKERT, Quality Assurance Auditor, VEGP, GPC, dated November 3, 1993.
52	Report of Interview of Paul M. KOCHERY, Engineering Supervisor, Plant Modifications, VEGP, GPC, dated November 3, 1993, with exhibits.
53	Report of Interview of Charles L. COURSEY, Superintendent, Maintenance Department, VEGP, GPC, dated November 3, 1993.
54	Report of Interview of Kenneth C. STOKES, Senior Engineer, VEGP, GPC, dated November 3, 1993.
55	Copy of Letter of Transmittal, signed by R. P. McDONALD, and Page 3, Section III.3, of GPC's <u>RESPONSE TO MOSBAUGH/HOBBY 2.206 PETITION</u> , dated April 1, 1991.
56	NRC Special Team Inspection Report, No.s 50-424,425/90-19 Supplement 1, dated November 1, 1991.

<u>Exhibit No.</u>	<u>Description</u>
57	Transcript of MOSBAUGH audio tape (NRC #187).
58	MOSBAUGH audio tape, dated August 15, 1990, #3 (NRC #253).
59	MOSBAUGH audio tape, undated (NRC #184).
60	Transcript of MOSBAUGH audio tape (NRC #184).
61	MOSBAUGH audio tape, dated April 11, 1990 (NRC #42).
62	Transcript of MOSBAUGH audio tape, (NRC #42).
63	MOSBAUGH audio tape, dated August 30, 1990, #2 (NRC #269).
64	Transcript of MOSBAUGH audio tape, (NRC #269).
65	MOSBAUGH audio tape, dated April 11, 1990, #1 (NRC #41).
66	Transcript of MOSBAUGH audio tape, (NRC #41).
67	MOSBAUGH audio tape, dated August 17, 1990, #1 (NRC #258).
68	Transcript of MOSBAUGH audio tape (NRC # 258). <i>68</i>
69	MOSBAUGH audio tape, dated March 23-24, 1990 (NRC #10).
70	Transcript of MOSBAUGH audio tape, (NRC #10).
71	MOSBAUGH audio tape, dated June 29, 1990, #1 (NRC #186).
72	Transcript of MOSBAUGH audio tape (NRC #186).
73	MOSBAUGH audio tape, undated, with the word "McCOY" written on it. (NRC #99).
74	Transcript of MOSBAUGH audio tape (NRC #99).
75	MOSBAUGH audio tape, dated July 27, 1990, #1 (NRC #222).
76	Transcript of MOSBAUGH audio tape (NRC #222).
77	MOSBAUGH audio tape, dated August 13, 1990, #3 (NRC #247).
78	Transcript of MOSBAUGH audio tape (NRC #247).
79	MOSBAUGH audio tape, dated August 13, 1990, #2 (NRC #246).
80	Transcript of MOSBAUGH audio tape (NRC #246).
81	MOSBAUGH audio tape, dated August 15, 1990, #4 (NRC #254).

<u>Exhibit No.</u>	<u>Description</u>
82	Transcript of MOSBAUGH audio tape (NRC #254).
83	MOSBAUGH audio tape, dated July 30, 1990, #2 (NRC #226).
84	Transcript of MOSBAUGH audio tape (NRC #226).
85	MOSBAUGH audio tape, dated July 30, 1990, #3 (NRC #227).
86	Transcript of MOSBAUGH audio tape (NRC #227).
87	MOSBAUGH audio tape, dated August 15, 1990, #3 (NRC #253).
88	Transcript of MOSBAUGH audio tape (NRC #253).
89	MOSBAUGH audio tape, dated July 23, 1990, #2 (NRC #215).
90	Transcript of MOSBAUGH audio tape (NRC #215).
91	MOSBAUGH audio tape, dated August 29, 1990, #2, (NRC #267).
92	Transcript of MOSBAUGH audio tape (NRC #267).
93	MOSBAUGH audio tape, dated July 23, 1990, #1 (NRC #214).
94	Transcript of MOSBAUGH audio tape (NRC #214).
95	Report of Interview of George BOCKHOLD, dated November 23, 1993.
96	MOSBAUGH audio tape, dated (NRC #187).
97	MOSBAUGH audio tape, dated June 12, 1990 (NRC #160).
98	Transcript of MOSBAUGH audio tape (NRC #160).

THE FOLLOWING EXHIBITS WERE SPECIFICALLY IDENTIFIED BY THE LAW FIRM OF TROUTMAN-SANDERS, ON BEHALF OF THEIR CLIENT, GEORGIA POWER COMPANY.

99	MOSBAUGH audio tape, dated March 24, 1990 (NRC #11). Note: there is no NRC transcript of this tape.
100	NRC Inspection Report No. 90-05, dated April 26, 1990.
101	NRC IIT transcript No. 147, dated March 30, 1990.
102	NRC IIT transcript No. 257, dated April 3, 1990.
103	NRC IIT transcript No. 168-1, dated April 4, 1990.

<u>Exhibit No.</u>	<u>Description</u>
104	NRC IIT transcript No. 200, dated April 5, 1990.
105	NRC IIT transcript No. 212, dated April 10, 1990.
106	NRC IIT transcript No. 205, dated April 7, 1990.
107	NRC IIT transcript No. 245, dated April 12, 1990.
108	MOSBAUGH audio tape, dated March 28, 1990, #1 (NRC #19). Note: No NRC transcript.
109	MOSBAUGH audio tape, dated April 10, 1990, #2 (NRC #40). Note: No NRC transcript.
110	MOSBAUGH audio tape, dated April 26, 1990, #2 (NRC #69). Note: No NRC transcript.
111	MOSBAUGH audio tape, dated April 27, 1990, #1 (NRC #71). Note: No NRC transcript.
112	Copy of the minutes of Vogtle Plant Review Board (PRB) meeting, No. 90-59, dated April 18, 1990.
113	Two folders of indexed documents, received from Troutman Sanders on October 7, 1993.