

575

RELATED CORRESPONDENCE

April 15, 1985

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

Docket Nos. 50-424 *ol*  
50-425 *ol*

APPLICANTS' MOTION TO COMPEL A RESPONSE TO  
APPLICANTS' FOURTH SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS

On March 5, 1985, Applicants hand-delivered to Joint Inter-  
venors "Applicants' Fourth Set of Interrogatories and Request  
For Production of Documents." In accordance with the Board's  
Prehearing Conference Order, Joint Intervenors were required to  
serve their response by no later than April 4, 1985. See LBP-84-35,  
20 N.R.C. 887, 917 (1984). As of this date, Joint Intervenors  
have not responded. In several telephone conversations initiated  
by counsel for Applicants to resolve this situation, representatives  
for Joint Intervenors have offered no excuse for the delay, and  
have not specified when they will respond. They have indicated  
only that they will respond as soon as they can.

It is critical that the parties to this proceeding strictly  
adhere to the time requirements. Written discovery was to have

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been completed by April 4, 1985 with all other discovery (i.e., depositions) to be finished by May 3, 1985. Because of Joint Intervenors' delay, Applicants have already had to postpone their deposition of Joint Intervenors' designated quality assurance witness. This delay may hinder Applicants' ability to complete depositions within the period allowed, and might otherwise delay ultimate resolution of the matter and prejudice Applicants' ability to prepare their case in a timely and thorough manner.

Joint Intervenors have failed to respond, as required by the Board's Prehearing Conference Order. For this reason, Applicants request that the Board compel Joint Intervenors to respond to Applicants' Fourth Set of Interrogatories and Request for Production of Documents, and that such response be served upon Applicants on or before April 22, 1985.

Respectfully submitted,



George F. Trowbridge, P.C.  
Bruce W. Churchill, P.C.  
David R. Lewis  
SHAW, PITTMAN, POTTS & TROWBRIDGE

James E. Joiner, P.C.  
Charles W. Whitney  
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TROUTMAN, SANDERS, LOCKERMAN & ASHMORE

Counsel for Applicants

Dated: April 15, 1985

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Motion to Compel Response to Applicants' Fourth Set of Interrogatories and Request for Production of Documents" were served, by deposit in the United States mail, first class, postage prepaid, to all those on the attached Service List, except that those marked with an asterisk were served by deposit with Express Mail, this 15th day of April, 1985.

  
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Bruce W. Churchill, P.C.

Dated: April 15, 1985

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