

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
GEORGIA POWER COMPANY, et al.) Docket Nos. 50-424
) 50-425
(Vogtle Electric Generating Plant,)
Units 1 and 2))
)

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OFFICE OF SECRETARY
DOCKET NO. 50-424
50-425

APPLICANTS' SECOND 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 contentions 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).

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 Intervenors obtain any new or differing information responsive to the interrogatories.

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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, number, author, date of publication and publisher, addressee, date written or approved, the Applicants' identification number (for these documents which have been produced by Applicant to Intervenor 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 (GANE) and/or Campaign for a Prosperous Georgia (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. "OA/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.

II. INTERROGATORIES

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

A. Specific Interrogatories

Contention 8 (Quality Assurance)

1. PROCUREMENT:

8.1-1

Do you contend that Applicants' method of approving qualified vendors adversely affected or evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the specific aspect(s) of the method of approval which you contend is improper and the specific manner in which it is improper;
- b) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- c) the identification of any document upon which you rely in support of your contention or explanation.

8.1-2

Do you contend that Applicants' method of approving qualified vendors has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in

detail the basis for your contention and include within your explanation:

- a) the specific location of the unsafe condition;
- b) the specific manner in which the condition is unsafe;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.1-3

Define your use of the phrase "Applicants' method of auditing vendors to assure compliance with contract specifications" as that phrase is used in Interrogatory No. 2 of your Second Set of Interrogatories and Requests to Produce and as used by you in this proceeding.

8.1-4

Do you contend that Applicants' method of auditing vendors to assure compliance with contract specifications and QA/QC requirements adversely affects or evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the specific aspect(s) of the method of auditing which you contend is improper and the specific manner in which it is improper;

b) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

c) the identification of any document upon which you rely in support of your contention or explanation.

8.1-5

Do you contend that Applicants' method of auditing vendors to assure compliance with contract specifications and QA/QC requirements has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the specific location of each such unsafe condition;

b) the specific manner in which each such condition is unsafe;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.1-6

Define the use of your term "engineering change notice" as used in Interrogatory No. 13 of your Second Set of Interrogatories and Requests to Produce and as used by you in this proceeding.

8.1-7

Do you contend that any engineering change notice generated at VEGP for equipment that could not meet original specification has adversely affected or evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) a description or the identification of each such engineering change notice;

b) a description or the identification of each such piece of equipment;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.1-8

Do you contend that any engineering change notice generated at VEGP for equipment that could not meet original specification has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) a description or the identification of each such engineering change notice;

b) a description or the identification of each such piece of equipment;

c) the specific location of each such unsafe condition;

d) the specific manner in which each such condition is unsafe;

e) the identity 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.

8.1-9

Do you contend that the replacement of any vendor at VEGP has adversely affected or evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the identity of each such vendor;

b) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

c) the identification of any document upon which you rely in support of your contention or explanation.

8.1-10

Do you contend that inferior materials or equipment have been used at VEGP?

8.1-11

If your response to the preceding Interrogatory is affirmative, do you contend that the use of inferior materials or equipment evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) a specific description or the identification of each piece of material or equipment which you contend was inferior;
- b) the location where each such piece of material or equipment was, or will be, used at VEGP;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.1-12

If your response to Interrogatory 8.1-10 is affirmative, do you contend that the use of inferior materials or equipment has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) a specific description or the identification of each piece of material or equipment which you contend was inferior;

b) the location where each such piece of material or equipment was, or will be, used a VEGP;

c) the specific manner in which the condition is unsafe;

d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

e) the identification of any document upon which you rely in support of your contention or explanation.

8.1-13

Explain the basis for your contention that Applicants' QA/QC program has been inadequate with regard to procurement practices, and include within your explanation:

a) each particular practice to which you refer;

b) the manner in which the practice is inadequate;

c) a discription of any materials or equipment improperly procured as a result of the practice;

d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

e) the identification of any document upon which you rely in support of your contention or explanation.

8.1-14

Identify each and every person who has contacted you in any way, or whom you have contacted, and whom you

contend has expressed a concern about supplies, materials or equipment that are being provided for use at VEGP.

8.1-15

With regard to each person identified in response to the preceding interrogatory, please state:

- a) the manner in which the person communicated with you or you communicated with that person;
- b) the date on which the communication occurred;
- c) the substance of the communication;
- d) the specific supplies, materials or equipment about which they expressed a concern; and
- e) identification of any written document received from that person.

8.1-16

Do you contend that any procurement practice at VEGP has resulted in any unsafe and uncorrected condition or will endanger the public health and safety? If so, please explain the basis for your response and include within your explanation:

- a) the specific procurement practice(s) to which you refer;
- b) the specific unsafe condition(s) to which you refer;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

2. WELDING:

8.2-1

Do you contend that the cracking in the containment pipe rack welds evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

b) the identification of any document upon which you rely in support of your contention or explanation.

8.2-2.

Do you contend that the cracking in the containment pipe rack welds has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) each unsafe condition to which you refer;

b) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

c) the identification of any document upon which you rely in support of your contention or explanation.

8.2-3

Identify each Notice of Violation issued with regard to VEGP which you contend relates to implementing the required test procedures for welds.

8.2-4

Do you contend that any deficiency involving welds in containment liner penetrations evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the specific location of each particular weld to which you refer;

b) the particular nature of the deficiency;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.2-5

Do you contend that any deficiency involving welds in containment liner penetrations has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the specific location of the unsafe condition;
- b) the specific manner in which the condition is unsafe;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.2-6

Do you contend that any of Applicants' construction sheets for examination of reactor coolant pressure boundary welds did not specify the penetrant examination test required by the NRC?

8.2-7

If your answer to the preceding Interrogatory is affirmative, do you contend that this failure evidences a deficiency in the quality assurance program of VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the specific construction sheet(s) to which you refer;
- b) the manner in which the sheet(s) failed to comply with NRC requirements;
- c) the specific NRC requirement to which you refer;

d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

e) the identification of any document upon which you rely in support of your contention or explanation.

8.2-8

If your answer to Interrogatory 8.2-6 is affirmative, do you contend that this failure has resulted in any unsafe or uncorrected condition at VEGP? If so, please explain in detail the basis of your contention and include within your explanation:

a) the specific construction sheet(s) to which you refer;

b) the manner in which the sheet(s) failed to comply with NRC requirements;

c) the specific NRC requirement to which you refer;

d) the specific location of each unsafe condition;

e) the specific manner in which each condition is unsafe.

8.2-9

Do you contend that Applicants failed to assure that non-destructive testing of welds was conducted consistent with applicable codes? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the location of the weld;
- b) the applicable code which you contend should have been followed;
- c) the ways in which the test deviated from the applicable code;
- d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- e) the identification of any document upon which you rely in support of your contention or explanation.

8.2-10

Identify each instance in which you contend Applicant failed to use adequate acceptance radiographs in examination of welds.

8.2-11

With regard to each particular instance identified in response to the preceding interrogatory, please state:

- a) the manner in which the examination deviated from "adequate radiographs";
- b) what you consider to be "adequate radiographs";
- c) describe the basis for your contention that the failure to use "adequate radiographs" adversely affected or evidences a deficiency in the quality assurance program at VEGP;

d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

e) the identification of any document upon which you rely in support of your contention or explanation.

8.2-12

State specifically what "allegations" were made by "a Walsh Company boilermaker that improper welding and work practice had occurred" (which you suggest at p. 18 of your Supplement to Petition For Leave To Intervene and Request for Hearing filed on April 11, 1984), and with regard to each such allegation state:

a) the identity of the individual making the allegation;

b) the identity of the person to whom the allegation was made;

c) the date the allegation was made;

d) the nature of the allegation.

e) the identification of any document which relates or refers to any such allegation.

8.2-13

Do you contend that the failure to establish adequate radiography procedures and welding procedures has led to any lack of confidence in the safe operation of VEGP? If so, please explain the basis for your contention and include within your explanation:

- a) the specific radiography procedure to which you refer;
- b) the specific welding procedure to which you refer;
- c) the manner in which you contend any such procedures are inadequate;
- d) what you consider to be adequate procedures which should have been followed, but which you contend were not followed;
- e) the identity 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.

8.2-14

Explain the basis for your contention that Applicants' QA/QC program has been inadequate with regard to welding, and include within your explanation:

- a) each specific aspect of the program which you consider to be inadequate and the manner in which it is inadequate;
- b) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- c) the identification of any document upon which you rely in support of your contention or explanation.

8.2-15

Do you contend that the procedures for welding during any weather condition have adversely affected or evidence a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the location of any weld which you contend was performed using a procedure which you contend is improper;
- b) the particular procedure to which you refer;
- c) the weather condition to which you refer;
- d) whether the weld is unsafe, and, if so, the manner in which it is unsafe;
- e) the identity 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.

8.2-16

Identify each and every instance in which you base your allegation (as set forth at p.14 to your Amendment to Supplement to Petition To Intervene And For Rehearing filed May 27, 1984) that Applicants have restricted the quality assurance methods to explicitly designated procedures and in which Applicants have disregarded "more

comprehensive standards of engineering practice" to the extent it has undermined the confidence in the critical functioning of the welds in both the reactor coolant and containment systems at VEGP.

8.2-17

With regard to each and every instance identified in response to the preceding interrogatory, please identify and describe the "more comprehensive standards of engineering practice" which should have been followed but which were disregarded.

8.2-18

With regard to your responses to the two preceding Interrogatories, please state:

- a) the specific location of any weld affected;
- b) the specific manner in which the weld was affected;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.2-19

Do you contend that any specific welds at VEGP are unsafe? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the location of each specific weld;
- b) the manner in which you contend each such weld is unsafe;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

3. CONCRETE:

8.3-1

Define your use of the terms "plastic concrete" and "Unit 1 RB base mat pour" as used in your Second Set of Interrogatoires and Requests To Produce and as you use those terms in this proceeding.

8.3-2

Do you contend that the in process testing of the "plastic concrete" for "Unit 1 RB base mat pour" was improperly performed or inadequate?

8.3-3

If your answer to the preceding interrogatory is affirmative, do you contend the improper or inadequate testing of the pour adversely affected or evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

b) the identification of any document upon which you rely in support of your contention or explanation.

8.3-4

If your answer to interrogatory 8.3-2 is affirmative, do you contend the improper or inadequate testing of the pour has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the specific location of the unsafe condition;

b) the specific manner in which the condition is unsafe;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.3-5

Do you contend the method of documenting the placement of the concrete for the "Unit 1 RB base mat pour" evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the

basis for your contention and include within your explanation:

- a) the manner in which the documentation was improper or inadequate;
- b) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention,
- c) the identification of any document upon which you rely in support of your contention or explanation.

8.3-6

Do you contend that any test of lifting eyes of concrete hatch covers evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the identification of the hatch covers to which you refer;
- b) the date on which the test was performed;
- c) the manner in which the test is inadequate;
- d) the present location of the lifting eyes and the hatch covers;
- e) the identity 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.

8.3-7

Do you contend that any test of lifting eyes of concrete hatch covers has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the identification of the hatch covers to which you refer;
- b) the date on which the test was performed;
- c) the manner in which the test is inadequate;
- d) the present location of the lifting eyes and the hatch covers;
- e) the manner in which each condition is unsafe;
- 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.

8.3-8

Do you contend that there is a factual basis for the allegations made by former employees of inadequate concrete QC testing and/or falsification of QC test records?

If so, do you further contend that this evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) a description of each specific allegation;
- b) with regard to each specific allegation, identify the person making the allegation, the person to whom the allegation was made and the date the allegation was made;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.3-9

If you contend that there is a factual basis for the allegations made by former employees of inadequate concrete QC testing and/or falsification of QC test records, do you contend that this has resulted in any unsafe or uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the specific location of the unsafe condition;
- b) the specific manner in which the condition is unsafe;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.3-10

Explain the basis for your contention that Applicants' QA/QC program has been inadequate with regard to properly documenting the placement of concrete, and include within your explanation:

a) the precise manner in which the QA/QC program is inadequate;

b) the manner in which the QA/QC program should be written or implemented in order to be adequate;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.3-11

Explain the basis for your contention that Applicants' QA/QC program has been inadequate with regard to testing of concrete, and include within your explanation:

a) the precise manner in which the QA/QC program is inadequate;

b) the manner in which the QA/QC program should be written or implemented in order to be adequate;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.3-12

Explain the basis for your contention that Applicants' QA/QC program has been inadequate with regard to preparation of correct concrete quality test records, and include within your explanation:

a) the precise manner in which the QA/QC program is inadequate;

b) the manner in which the QA/QC program should be written or implemented in order to be adequate;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.3-13

Do you contend that the placement of any concrete at VEGP has resulted in any unsafe and uncorrected condition or will endanger the public health and safety? If so,

please explain in detail the basis for your contention and include within the explanation:

- a) the location of the concrete;
- b) the date the concrete was placed;
- c) the precise manner in which the placement is unsafe;
- d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- e) the identification of any document upon which you rely in support of your contention or explanation.

4. EQUIPMENT PROTECTION:

8.4-1

Do you contend that the method of equipment storage at VEGP evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) each particular piece of equipment to which you refer as having been improperly stored;
- b) the method of storage to which you refer;
- c) the manner in which the equipment should have been stored;
- d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

e) the identification of any document upon which you rely in support of your contention or explanation.

8.4-2

Do you contend that the method of equipment storage at VEGP has resulted in any unsafe and uncorrected condition or will endanger the public health and safety? If so, please explain in detail the basis for your contention and include within your explanation:

a) each particular piece of equipment to which you refer as having been improperly stored or which has resulted in an unsafe condition;

b) the unsafe condition which has resulted;

c) the method of storage to which you refer;

d) the manner in which the equipment should have been stored;

e) the identity 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.

8.4-3

Please specifically identify each incident of damage done to any electrical cabinets on site of which you are aware, and state:

- a) the precise piece of equipment damaged;
- b) the specific damage done;
- c) the date of the damage or incident;
- d) the location of the cabinet when it was damaged;
- e) the present location of the cabinet;
- f) the identification of any document upon which you rely in support of your contention or explanation.

8.4-4

With regard to each specific incident of damage to electrical cabinets identified in response to the preceding interrogatory, do you contend that it evidences a deficiency in the quality assurance program at VEGP? If so, please explain the basis for your contention and include in your explanation:

a) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

b) the identification of any document upon which you rely in support of your contention or explanation.

8.4-5

With regard to each specific incident of damage to electrical cabinets identified in response to Interrogatory 8.4-3, do you contend that it has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain the basis for your contention and include in your explanation:

- a) the specific location of the unsafe condition;
- b) the specific manner in which the condition is unsafe;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.4-6

Do you contend that procedures for protection of equipment by Applicants, its contractors or sub-contractors have been neglected? If so, please state:

- a) the particular procedure(s) to which you refer;
- b) the particular dates when the procedure(s) has been neglected;
- c) the manner in which the procedure(s) has been neglected;
- d) the particular equipment which has been affected by the neglect of procedure(s);
- e) whether the neglect described above has resulted in any unsafe condition, and, if so, the nature of the unsafe condition.

8.4-7

Do you contend that any of the incidents described in response to the preceding interrogatory has evidenced a

deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the specific incident or incidents to which you refer;

b) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

c) the identification of any document upon which you rely in support of your contention or explanation.

8.4-8

Explain the basis for your contention that Applicants' QA/QC program has been inadequate with regard to protection of equipment, and include within your explanation:

a) the identification of each piece of equipment which was not properly protected;

b) the specific part of the QA/QC program which has been inadequate;

c) the specific manner in which the program has been inadequate;

d) the manner in which the program should have provided for protection of equipment;

e) the identity 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.

5. CORRECTIVE ACTION:

8.5-1

Do you contend that Applicants have failed to take corrective action as required by the NRC in response to Notices of Violation? If so, please explain the basis for your contention and include within your explanation:

- a) each specific instance to which you refer;
- b) the manner in which the corrective action was untimely;
- c) the specific manner in which the program has been inadequate;
- d) the manner in which the program should have provided for protection of equipment;

8.5-2

If your response to the preceding Interrogatory is affirmative, do you contend that Applicants' failure to take corrective action in response to any Notice of Violation has evidenced a deficiency in the quality assurance program at VEGP? If so, please explain the basis for your contention and specifically describe:

- a) the original deficiency alleged;
- b) the corrective action which should have been taken;
- c) the manner in which you contend corrective action was not taken, or, if taken, was inadequate;
- d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- e) the identification of any document upon which you rely in support of your contention or explanation.

8.5-3

If your response to Interrogatory 8.5-1 is affirmative, do you contend that Applicants' failure to take corrective action in response to any Notice of Violation has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain the basis for your contention and specifically describe:

- a) the original deficiency alleged;
- b) the corrective action which should have been taken;
- c) the manner in which you contend corrective action was not taken, or, if taken, was inadequate;
- d) the specific location of the unsafe condition;
- e) the specific manner in which the condition is unsafe;

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.

6. GENERAL:

8.6-1

Identify each violation by Applicants of NRC regulations, rules or other requirements which violation(s) you contend involved a Contention No. 8 activity and explain the basis for your contention (at Prehearing Transcript p. 55) that such violation, or combination of violations, evidences a deficiency in the quality assurance program at VEGP.

8.6-2.

Identify 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 the capability of the coolant and containment systems to perform their essential tasks. (See, Supplement To Petition For Leave To Intervene and Request For Hearing, at p.15, filed April 11, 1984)

8.6-3

With regard to each NRC regulation described above, explain the basis for your contention that this violation

(either alone or in conjunction with other violations) has adversely affected or evidences a deficiency in the quality assurance program at VEGP, and include in your explanation:

- a) the manner in which the violation(s) has adversely affected the QA program;
- b) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- c) the identification of any document upon which you rely in support of your contention or explanation.

8.6-4

Do you contend that any contractor or subcontractor at VEGP involved in a Contention No. 8 activity has been terminated because of any deficiency in its quality assurance program or because it created any unsafe condition at VEGP? If so, please explain the basis for your contention and include in your explanation:

- a) the identification of the contractor(s) or subcontractor(s);
- b) the work being performed by the contractor or subcontractor prior to termination;
- c) the specific description and location of any inadequate work performed or unsafe condition which resulted from the contractor's or subcontractor's work;

d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

e) the identification of any document upon which you rely in support of your contention or explanation.

8.6-5

Do you contend that the training of workers involved in a Contention No. 8 activity (which training has been done by Applicants, Bechtel or individual contractors or subcontractors) has adversely affected or evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the particular training to which you refer;

b) the precise manner in which the training is inadequate;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.6-6

Do you contend that the training of workers involved in a Contention No. 8 activity (which training has been done by Applicants, Bechtel or individual contractors or

subcontractors) has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

- a) the particular training to which you refer;
- b) the precise manner in which the training is inadequate;
- c) where the work was done, when the work was done, by whom the work was done and the particular nature of the unsafe condition;
- d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- e) the identification of any document upon which you rely in support of your contention or explanation.

8.6-7*

Do you contend that any procedure has been changed (either by Applicants or its contractors) because workers were unable to comply with the original procedures?

8.6-8

If your answer to the preceding interrogatory is affirmative, do you contend that this has adversely affected or evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

b) the identification of any document upon which you rely in support of your contention or explanation.

8.6-9

If your answer to Interrogatory 8.6-7 is affirmative, do you contend that this has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for your contention and include within your explanation:

a) the specific condition to which you refer;

b) the specific manner in which the condition is unsafe;

c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

d) the identification of any document upon which you rely in support of your contention or explanation.

8.6-10

Please state each and every fact and circumstance upon which you rely in support of your allegation (at p.18 of your Supplement To Petition for Leave To Intervene and Request For Hearing filed April 11, 1984) that the failure of the quality assurance program at VEGP forced a meeting

conducted August 22, 1983, and explain why these facts or circumstances indicate an adverse impact on, or evidence a deficiency in, the quality assurance program at VEGP and specifically include in your explanation:

a) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

b) the identification of any document upon which you rely in support of your contention or explanation.

8.6-11

Please state specifically each and every "failure" to which you refer when you allege (at p. 17 of your Supplement To Petition For Leave To Intervene and Request For Hearing filed April 11, 1984) that "the number of past and continuing failures of the Georgia Power/Bechtel QA/QC program represents a pattern which indicates an undue risk to the health and safety of the public", (insofar as such allegations involve your Contention No. 8, as admitted by the Board) and with regard to each "failure" state:

a) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;

b) the identification of any document upon which you rely in support of your contention or explanation.

8.6-12

Do you contend that the quality assurance program implemented at VEGP with respect to contention No. 8 activities is not consistent and does not comply with the NCR regulations, specifically 10 C.F.R. 50, Appendix B? If so, please explain your contention in detail and include as a part of your explanation:

- a) the specific regulation to which you refer;
- b) the precise manner in which you contend applicants did not comply with those regulations;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.6-13

Please identify each and every person whom you contend has made an allegation to you or any other person regarding a deficiency in any Contention No. 8 activity at VEGP.

8.6-14

With regard to each and every person identified above, please state:

- a) the date on which communication was made to you (or, if the communication was made to another person, the date on which you first learned of the allegation);

- b) the form in which the communication occurred (verbal or written);
- c) the substance of the allegation; and
- d) if written, identify each and every document which you contend contains the allegation or supports the allegation.

8.6-15

To the extent you have not already done so in response to any other particular Interrogatory, please identify each and every specific fact and circumstance upon which you rely in support of your contention that the quality assurance program at VEGP, as written with respect to Contention No. 8 activities, fails to give reasonable assurance that, as built, the facility can and will be operated without endangering the public health and safety.

8.6-16

To the extent you have not already done so in response to any other particular Interrogatory, please state each and every fact and circumstance upon which you rely in support of your contention that the quality assurance program at VEGP, as implemented with respect to Contention No. 8 activities, fails to give reasonable assurance that, as built, the facility can and will be operated without endangering the public health and safety.

8.6-17

Do you contend that the issuance of Stop Work Orders at VEGP or Applicants' response to any Stop Work Order (in so far as they relate to a Contention No. 8 activity) evidences a deficiency in the quality assurance program at VEGP? If so, 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 manner in which it affected the QA program;
- e) the identity 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.

8.6-18

Do you contend that the issuance of Stop Work Orders at VEGP or Applicants' response to any Stop Work Order (in so far as they relate to a Contention No. 8 activity) has resulted in any unsafe and uncorrected condition at VEGP? If so, 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 specific manner in which the condition is unsafe;
- e) the location of the unsafe condition;
- 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.

8.6-19

Do you contend that any deviation from original design specifications or procedures at VEGP (insofar as these deviations pertain to a Contention No. 8 activity) evidences a deficiency in the quality assurance program at VEGP? If so, please explain in detail the basis for such contention and include within your explanation:

- a) each deviation to which you refer;
- b) the manner in which the deviation evidences a deficiency in the QA program;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.6-20

Do you contend that any deviation from original design specifications or procedures at VEGP (insofar as these deviations pertain to your Contention No. 8, as admitted by the Board) has resulted in any unsafe and uncorrected condition at VEGP? If so, please explain in detail the basis for such contention and include within your explanation:

- a) each deviation to which you refer;
- b) the specific manner in which the deviation has resulted in an unsafe condition;
- c) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention;
- d) the identification of any document upon which you rely in support of your contention or explanation.

8.6-21

How do Intervenors contend that Applicants' quality assurance program has failed with respect to a Contention No. 8 activity.

8.6-22

Explain the basis for your statement (at p. 16 of your Supplement To Petition For Leave To Intervene and Request For Hearing, filed April 11, 1984) "Applicants'

disposition to prefer restrictive implementation of prescribed procedures to more circumspect methods of professional practice does not contribute to confidence in the proper functioning of a completed and operating Plant Vogtle", insofar as that statement is within the scope of your Contention No. 8, as admitted by the Board or insofar as you contend it is applicable to a Contention No. 8 activity; and, include within your explanation:

- a) each particular incident to which you refer;
- b) the "more circumspect methods of professional practice" which should have been applied to each incident and the manner in which it was not applied;
- c) whether any unsafe and uncorrected condition has resulted, and, if so, the location and nature of the unsafe condition;
- d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention; and
- e) the identification of any document upon which you rely in support of your contention or explanation.

8.6-23

Do you contend that any vendor or contractor or subcontractor has failed to comply with any quality assurance requirement within the scope of your Contention No. 8? If so, please explain the basis for your contention and specifically describe:

- a) the identity of the vendor, contractor or subcontractor to whom you refer;
- b) the specific QA requirement to which you refer;
- c) the specific manner in which each such vendor or contractor or subcontractor failed to comply with the QA requirement;
- d) the identity of all persons whom you believe to have knowledge of facts or circumstances upon which you base your contention; and
- e) the identification of any document upon which you rely in support of your contention or explanation.

8.6-24

Identify all present or former employees of Georgia Power Company, any vendor and/or any contractor or subcontractor at (or formerly at) VEGP with whom you have communicated, or had communication from, concerning any aspect of the construction or operation of VEGP in so far as it relates to your Contention No. 8, as admitted by the Board.

8.6-25

With regard to each person identified above, please state the date on which the communication occurred, the substance of the communication, and identify each written document which refers to or relates to the communication.

8.6-26

Please identify each and every communication which you have had with Government Accountability Project ("GAP") or Union of Concerned Scientists ("UCS") concerning the quality assurance program at VEGP, insofar as that quality assurance program relates to a Contention No. 8 activity.

8.6-27

Please identify each and every communication regarding your Contention No. 8, as admitted by the Board, which you have had with any group or individual, other than Applicants or the NRC, which group has provided aid, support or participated in any other NRC licensing proceeding.

8.6-28

With regard to each and every contact or communication referred to in response to the two preceding interrogatories, please identify the individual with whom the communication was made and describe the substance of the communication and identify each and every document which relates to or refers to the communication.

8.6-29

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.

8.6-30

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.

8.6-31

Identify each person you expect to call as an expert witness with respect to Contention No. 8, as admitted by the Board. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also, describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that Intervenorors respond in writing to the following request 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 the possession, custody or control of Intervenorors.

A document shall be deemed to be within the "control" of Intervenor if Intervenor has ownership, possession or custody of the document or a copy thereof or has the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

Documents requested

8-1

Each and every document identified or described or relied upon in support of your contention that Applicants' method of approving qualified vendors adversely affected or evidences a deficiency in the quality assurance program at VEGP or has created any unsafe condition at VEGP.

8-2

Each and every document identified or described or relied upon in support of your contention that Applicants' method of auditing vendors to assure compliance with contract specifications and QA/QC requirements has adversely affected or evidences a deficiency in the quality assurance program at VEGP or resulted in any unsafe and uncorrected condition at VEGP.

8-3

Each and every document identified or described or relied upon in support of your contention that any engineering change notice generated at VEGP for equipment that

could not meet original specification has adversely affected or evidences a deficiency in the quality assurance program at VEGP or resulted in an unsafe and uncorrected condition at VEGP.

8-4

Each and every document identified or described or relied upon in support of your contention that the replacement of any vendor, contractor or subcontractor at VEGP has adversely affected the quality assurance program at VEGP or resulted in an unsafe condition at VEGP.

8-5

Each and every document identified or described or relied upon in support of your contention that the use of inferior materials evidences a deficiency in the quality assurance program at VEGP or resulted in an unsafe condition at VEGP.

8-6

Each and every document identified or described or relied upon in support of your contention that Applicants' QA/QC program has been inadequate with regard to procurement practices.

8-7

Each and every document identified or described or relied upon in support of your contention that the cracking in the containment pipe rack welds evidences a

deficiency in the quality assurance program at VEGP or resulted in an unsafe and uncorrected condition at VEGP.

8-8

Each and every document identified or described or relied upon in support of your contention that any deficiency involving welds in containment liner penetrations evidences a deficiency in the quality assurance program at VEGP or resulted in an unsafe and uncorrected condition at VEGP.

8-9

Each and every document identified or described or relied upon in support of your contention that any of Applicants' construction sheets for examination of reactor coolant pressure boundary welds did not specify the penetrant examination test required by the NRC and thus evidences a deficiency in the quality assurance program at VEGP or created an unsafe and uncorrected condition at VEGP.

8-10

Each and every document identified or described or relied upon in support of your contention that Applicants failed to use adequate acceptance radiographs in examination of welds.

8-11

Each and every document identified or described or relied upon in support of your contention that "allegations" were made by "a Walsh Company boilermaker that improper welding and work practice had occurred."

8-12

Each and every document identified or described or relied upon in support of your contention that the failure to establish adequate radiography procedures and welding procedures has led to any lack of confidence in the safe operation of VEGP.

8-13

Each and every document identified or described or relied upon in support of your contention that Applicants' QA/QC program has been inadequate with regard to welding.

8-14

Each and every document identified or described or relied upon in support of your contention that the procedures for welding during any weather condition have adversely affected or evidence a deficiency in the quality assurance program at VEGP or have resulted in an unsafe and uncorrected condition at VEGP.

8-15

Each and every document identified or described or relied upon in support of your contention that Applicants

have restricted the quality assurance methods to explicitly designated procedures and in which Applicants have disregarded "more comprehensive standards of engineering practice" to the extent it has undermined the confidence in the critical functioning of the welds in both the reactor coolant and containment systems at VEGP.

8-16

Each and every document identified or described or relied upon in support of your contention that any specific welds at VEGP are unsafe.

8-17

Each and every document identified or described or relied upon in support of your contention that the in processing testing of the "plastic concrete" for "Unit 1 RB base mat pour" was improperly performed or inadequate.

8-18

Each and every document identified or described or relied upon in support of your contention that the tests of lifting eyes of concrete hatch evidence a deficiency in the quality assurance program at VEGP or resulted in an unsafe and uncorrected condition at VEGP.

8-19

Each and every document identified or described or relied upon in support of your contention that there is a factual basis for the allegations made by former employees of inadequate concrete QC testing and/or falsification of

QC test records and that this evidences a deficiency in the quality assurance program at VEGP or resulted in an unsafe and uncorrected condition at VEGP.

8-20

Each and every document identified or described or relied upon in support of your contention that Applicants' QA/QC program has been inadequate with regard to documenting the placement of concrete.

8-21

Each and every document identified or described or relied upon in support of your contention that Applicants' QA/QC program has been inadequate with regard to adequately testing concrete.

8-22

Each and every document identified or described or relied upon in support of your contention that Applicants' QA/QC program has been inadequate with regard to the preparation of correct concrete quality test records.

8-23

Each and every document identified or described or relied upon in support of your contention that the placement of any concrete at VEGP has resulted in an unsafe and uncorrected condition or will endanger the public health and safety.

8-24

Each and every document identified or described or relied upon in support of your contention that the method of equipment storage at VEGP evidences a deficiency in the quality assurance program at VEGP or resulted in an unsafe condition at VEGP.

8-25

Each and every document identified or described or relied upon in support of your contention that any incident of damage to electrical cabinets evidences a deficiency in the quality assurance program at VEGP or resulted in an unsafe and uncorrected condition at VEGP.

8-26

Each and every document identified or described or relied upon in support of your contention that procedures for protection of equipment by Applicants, its contractors or subcontractors have been neglected.

8-27

Each and every document identified or described or relied upon in support of your contention that Applicants' QA/QC program has been inadequate with regard to protection of equipment.

8-28

Each and every document identified or described or relied upon in support of your contention that Applicants' failure to take adequate corrective action in response to

any NRC Notice of Violation and that this evidences a deficiency in the quality assurance program at VEGP or resulted in an unsafe and uncorrected condition at VEGP.

8-29

Each and every document identified or described or relied upon in support of your contention that a violation of NRC regulations by Applicants in any a Contention No. 8 activity undermines the confidence and the capability of the coolant and containment systems to perform their essential tasks.

8-30

Each and every document identified or described or relied upon in support of your contention that any contractor or subcontractor at VEGP which was involved in a Contention No. 8 activity has had its contract terminated because of any deficiency in its quality assurance program or because it created any unsafe and uncorrected condition at VEGP.

8-31

Each and every document identified or described or relied upon in support of your contention that the training of workers involved in Contention No. 8 activities (which training has been done by Applicant, Bechtel or individual contractors or subcontractors) has resulted in an unsafe condition at VEGP or adversely affected the quality assurance program at VEGP.

8-32

Each and every document identified or described or relied upon in support of your contention that there has been a change in any procedure because workers were unable to comply with the original procedures which change has adversely affected or evidences a deficiency in the quality assurance program at VEGP or resulted in any unsafe and uncorrected condition at VEGP.

8-33

Each and every document identified or described or relied upon in support of your contention that the failure of the quality assurance program VEGP forced a meeting conducted August 22, 1983.

8-34

Each and every document identified or described or relied upon in support of your contention that "the number of past and continuing failures of the Georgia Power/Bechtel QA/QC program represents a pattern which indicates an undue risk to the health and safety of the public."

8-35

Each and every document identified or described or relied upon in support of your contention that the quality assurance program implemented at VEGP is not consistent and does not comply with the specific NRC regulations, specifically 10 C.F.R. 50, Appendix B.

8-36

Each and every document identified or described or relied upon in support of your contention that any person has made an allegation to you or any other person regarding a deficiency in a Contention No. 8 activity at VEGP.

8-37

Each and every document identified or described or relied upon in support of your contention that the quality assurance program at VEGP, as written with regard to Contention No. 8 activities, fails to give reasonable assurance that, as built, the facility can and will be operated without endangering the public health and safety.

8-38

Each and every document identified or described or relied upon in support of your contention that the quality assurance program at VEGP, as implemented with regard to Contention No. 8 activities, fails to give reasonable assurance that, as built, the facility can and will be operated without endangering the public health and safety.

8-39

Each and every document identified or described or relied upon in support of your contention that the issuance of any Stop Work Orders at VEGP or Applicants' response to any Stop Work Order (in so far as they relate to a Contention No. 8 activity) has adversely affected or

evidences a deficiency in the quality assurance program at VEGP or resulted in an unsafe and uncorrected condition at VEGP.

8-40

Each and every document identified or described or relied upon in support of your contention that any deviation from original design specifications or procedures at VEGP (insofar as these deviations pertain to a Contention No. 8 activity) adversely affects or evidences a deficiency in the quality assurance program at VEGP or has resulted in an unsafe and uncorrected condition at VEGP.

8-41

Each and every document which contains, refers to, or relates to each and every communication to or from any present or former Georgia Power Company employees, vendor employees and employees of any contractor or subcontractor at (or formerly at) VEGP.

8-42

Each and every document which contains, refers to, or relates to each and every communication which you have had with Government Accountability Project ("GAP") or Union of Concerned Scientists ("UCS") concerning the quality assurance program at VEGP.

8-43

Each and every document which contains, refers to or relates to each and every communication regarding your

Contention No. 8, as admitted by the Board, which you have had with any group or individual, other than Applicants or the NRC, which group has provided aid, support or participated in any other NRC licensing procedure.

8-44

Each and every document identified or described or relied upon in answer or response to any of the specific interrogatories above.

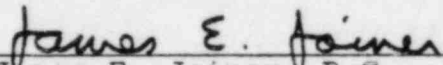
8-45

Each and every document that Intervenors used or referred to in preparing their response to any of the specific or general interrogatories above.

8-46

All correspondence between Intervenors or anyone else concerning your Contention No. 8, as admitted by the Board.

Respectfully submitted,


James E. Joiner, P.C.
Charles W. Whitney
Kevin C. Greene
Hugh M. Davenport
TROUTMAN, SANDERS, LOCKERMAN
& ASHMORE

George F. Trowbridge, P.C.
Ernest L. Blake, Jr., P.C.
David R. Lewis
SHAW, PITTMAN, POTTS
& TROWBRIDGE

Counsel for Applicants

Dated: January 4th, 1984