

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER CO., et al.

(Vogtle Electric Generating Plant,  
Units 1 and 2)

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Docket Nos. 50-424 and 50-425

CPG/GANE'S RESPONSE TO APPLICANTS' SECOND SET OF  
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

Intervenors Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy respond herein to "Applicants' Second Set of Interrogatories and Request for Production of Documents."

A. Specific Interrogatories

Contention 8 (Quality Assurance)

8.1-1 Yes. Anonymous allegations of file doctoring suggest that vendors were qualified not on the basis of the "quality assurance" program at Vogtle but rather on the basis of past work with the Applicants. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.1-2 Breakdowns in the Applicants' method of selecting qualified vendors could result in unsafe and uncorrected conditions at Plant Vogtle. The purpose of having

a methodology for approving only qualified vendors is to assure that the only vendors who are hired are those who will perform satisfactorily and will avoid unsafe conditions; breakdowns in this methodology (or weaknesses in the methodology) raise questions as to the safety of the work conducted by the vendors. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.1-3 Intervenors assume that Applicants' reference is to Intervenors' Interrogatory No. 3 of our Second Set of Interrogatories and Requests to Produce, since Interrogatory No. 2 does not use the phrase "Applicants' method of auditing vendors to assure compliance with contract specifications." In Interrogatory 3, Intervenors use the phrase "Applicants' method of auditing vendors to assure compliance with contract specifications" to include all methods of assuring that contractors are complying with the requirements of their contracts and by implication with all NRC regulations and standards. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.1-4 Yes. Deficiencies in the Applicants' auditing program obviously have serious implications for the Vogtle QA/QC program. Anonymous informants have alleged that the Applicants fail to audit their vendors adequately. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.1-5 If the informants' information is accurate, there is substantial reason to believe that unsafe conditions at the plants would result. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.1-6 "Engineering change notice" refers to changes from original equipment specifications. For example, see Notice of Violation concerning Design Change Notices, Nov. 30 1984, Inspection Report Nos. 50-424 & 425/84-30.

8.1-7 Intervenors will provide a response to this interrogatory following examination of the Applicants' response to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to

Intervenors' followup questions concerning quality assurance.

8.1-8 Please see the response to 8.1-7 above.

8.1-9 Yes. If the vendor(s) performed inadequately (in whatever way or ways) then the QA program should have prevented their being hired. If the vendor(s) performed adequately, then the question is raised as to why they were dismissed. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.1-10 Yes.

8.1-11 Yes. Many, many examples could be cited, such as the installation of 239 inadequate circuit breakers in equipment at Vogtle; to cited all such examples would be unduly burdensome on the Intervenors, and we hereby refer the Applicants to the NRC's Public Document Room (as well as the Applicants' own records) as evidence. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.1-12 Use of inferior materials or equipment by definition can result in compromising of safety at Vogtle. The response to 8.1-11 above is incorporated



herein by reference.

8.1-13 Intervenors hereby incorporate by reference the above responses related to procurement.

8.1-14 Intervenors object to this interrogatory on the grounds that it is vague, a violation of possible confidences, an invasion of privacy and would do nothing to resolve the issues of concern raised by Intervenors in this proceeding. Beyond that, Intervenors state that individuals claiming to work for the Applicants or the Applicants' vendors have expressed certain concerns, as outlined herein, and have withheld their names from Intervenors in order to prevent retaliation by Applicants.

8.1-15 Please see the response to 8.1-14 above.

8.1-16 Please see the response to 8.1-13 above.

#### Welding

8.2-1 Yes. Please see letter and attachment from Donald O. Foster to James P. O'Reilly dated October 17, 1984. An adequate QA program would prevent such problems. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.2-2 Yes. In the words of Georgia Power's D. O. Foster, "this condition is reportable as a substantial safety hazard and a significant deficiency." Please see response to 8.2-1 above.

8.2-3 All Notices of Violation relate to implementing the required test procedures for welds. Some relate specifically to welding, including but not limited to Report

No.s 50-424 & 425/83-16, Appendix A, August 31, 1983. Others relate to welding to the extent that breakdowns in QA anywhere demonstrate the possibility of breakdowns in QA everywhere. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.2-4 Yes. An adequate QA program should prevent the deficiencies in welding which have been so widespread at Plant Vogtle. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.2-5 Welding deficiencies in containment liner penetrations are fundamentally dangerous. This is self-evident. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the

Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.2-6 Intervenors have not examined Applicant's construction sheets for examination of reactor coolant pressure boundary welds, but will respond if and when we have an opportunity to do so. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.2-7 See response to 8.2-6.

8.2-8 See response to 8.2-6.

8.2-9 Yes. See, for example, the August 31, 1983 Notice of Violation 50-424 & 425/83-16. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.2-10 See 8.2-9 above.

8.2-11 See 8.2-9 above.

8.2-12 Please see the letter from James P. O'Reilly to Georgia Power, 28 September 1983, Subject: Summary of Meeting--Docket Nos. 50-424 & 50-425, which was

specifically referenced in our "Supplement[s] to Petition[s] for Leave to Intervene."

8.2-13 Yes. Inadequate radiography and welding procedures obviously lead to lack of confidence in safety; welding literally holds the facility together. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.2-14 The Applicants' long history of problems with welding demonstrates the inadequacy of the Applicants' QA/QC program with regard to welding. Applicants have repeatedly been cited by the Nuclear Regulatory Commission for inadequate welding, a fundamentally clear indication of breakdowns in the QA/QC program. Please see the basis for Intervenors' contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.2-15 Yes. Please see the response to 8.2-14 above.

8.2-16 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Fetition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984.



Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.3-11 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.3-12 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.3-13 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

## Equipment Protection

8.4-1 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.4-2 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.4-3 Intervenors have not personally inspected the electrical cabinets on site. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.4-5 Yes. Intervenors hereby incorporate by reference the basis for their

contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.4-5 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.4-6 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.4-7 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following

review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.4-8 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

#### Corrective Action

8.5-1 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.5-2 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup



questions concerning quality assurance.

8.5-3 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

#### General

8.6-1 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-2 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-3 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing,

Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-4 Intervenors will respond to this interrogatory upon completing review of Applicants' responses to Intervenors' discovery questions related thereto.

8.6-5 Yes. If workers were adequately trained, the problems should not have occurred. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-6 Please see related responses above.

8.6-7 Intervenors will respond further following review of Applicants' responses to related questions by the Intervenors.

8.6-8 Please see response to 8.6-7 above.

8.6-9 Please see response to 8.6-7 above.

8.6-10 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984.

Intervenors will provide further information if warranted following review of the

Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-11 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-12 Yes. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-13 Intervenors object to this Interrogatory on the grounds that it is a violation of the privacy of individuals who may have spoken to Intervenors. Intervenors further state that many individual claiming to work for the Applicants' or their contractors have made certain allegations to the Intervenors but have withheld their names to prevent feared reprisals by the Applicants' or their contractors.

8.6-14 Please see 8.6-13 above.

8.6-15 Please see the responses above. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition

for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-16 Please see the responses above. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-17 It depends upon the reasons behind specific Stop Work Orders, the possible failure to issue Stop Work Orders when needed, and the adequacy of corrective action prior to resumption of work.

8.6-18 Please see response to 8.6-17 above.

8.6-19 It depends upon the reasons for the deviations. Intervenors will further respond as needed following review of the Applicants' responses to related inquiries by the Intervenors.

8.6-20 Please see response to 8.6-19 above.

8.6-21 Please see the responses above. In addition, Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia"



dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-22 Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-23 Please see the responses above. Intervenors hereby incorporate by reference the basis for their contention as described in "Supplement to Petition for Leave to Intervene and Request for Hearing, Campaign for a Prosperous Georgia" dated April 11, 1984 and "CPG/GANE's Response to NRC Staff's Second Set of Interrogatories" dated December 19, 1984. Intervenors will provide further information if warranted following review of the Applicants' responses to Intervenors' "Third Set of Interrogatories and Requests to Produce" and the Applicants' Responses to Intervenors' followup questions concerning quality assurance.

8.6-24. Intervenors object to this Interrogatory on the grounds that it is vague and not subject to response. To fully respond would be unduly burdensome, would violate the privacy of individuals who may have communicated with Intervenors, would restrict the free flow of information, would not contribute to resolution of any issues in this proceeding and could even detract from resolution of issues in this proceeding.

8.6-25 Please see response to 8.6-24 above.

8.6-26 Intervenors object to this Interrogatory on the grounds that it violates privacy, attempts to restrict free flow of information, violates constitutional rights of certain individuals and would not lead to resolution of any issues in this proceeding.

8.6-27 Intervenors object to this Interrogatory on the grounds that it is vague, not subject to response, burdensome, violates privacy, violates constitutional rights and would not contribute to resolution of any issues in this proceeding.

8.6-28 Please see the responses to the two preceding interrogatories.

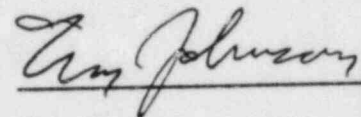
8.6-29 Intervenors will make available all documents used in formulating these responses, with the exception of those which might violate privacy.

8.6-30 These responses were prepared in their entirety by Doug Teper and Tim Johnson.

8.6-31 Intervenors have not yet selected their expert witnesses for this contention, but will inform Applicants' when such experts have been selected.

REQUEST FOR PRODUCTION OF DOCUMENTS

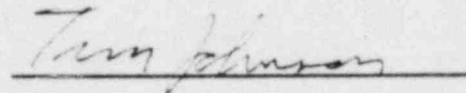
Intervenors will make the requested documents available for inspection at 175 Trinity Avenue at a time mutually acceptable to Intervenors and Applicants. However, intervenors object to making available correspondence or similar information which would violate the privacy or constitutional rights of anyone.



Tim Johnson  
Executive Director  
Campaign for a Prosperous Georgia  
175 Trinity Ave. S.W.  
Atlanta, Georgia 30303

I hereby affirm that the information I provided for Intervenors' Responses to Applicants' Second and Third Sets of Interrogatories and Requests to Produce is true to the best of my information and belief.

This, the fourth day of February, 1985,

A handwritten signature in cursive script, appearing to read "Tim Johnson", is written above a solid horizontal line.

Tim Johnson

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER CO., et al.

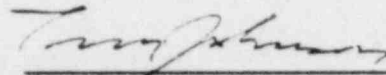
(Vogtle Electric Generating Plant,  
Units 1 and 2)

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)

Docket Nos. 50-424 and 50-425

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing Intervenor's Responses to Applicants' second and third sets of interrogatories and requests to produce were served by deposit with the U. S. Postal Service in the City of Atlanta with first class postage attached to be delivered to the Secretary of the Commission, the members of the Licensing Board and all others listed below, this fourth day of February, 1985.



Tim Johnson  
Campaign for a Prosperous Georgia

SERVICE LIST

Morton B. Margulies, Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Oscar H. Paris  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
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Mr. Gustave A. Linenberger  
Atomic Safety & Licensing Board  
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Atomic Safety & Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

James E. Joiner  
Sumner C. Rosenberg  
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Atomic Safety & Licensing Appeal  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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