

UNITED STATES OF AMERICA  
 NUCLEAR REGULATORY COMMISSION

DOCKETED  
 USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

04 OCT 29 P1:17

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

Docket Nos. 50-424 and 50-425

CAMPAIGN FOR A PROSPEROUS GEORGIA/GEORGIANS AGAINST NUCLEAR ENERGY  
 FIRST SET OF INTERROGATORIES AND REQUESTS TO PRODUCE

Pursuant to 10 CFR Sections 2.740 (b) and 2.741, Intervenors Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy (hereinafter "CPG/GANE") hereby serves its First Set of Interrogatories and Requests to Produce upon the Applicant in the above-styled proceeding. These interrogatories and requests to produce involve CPG/GANE's Contentions 7, 10, 11, 12 and 14.

Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to the Applicant including its officers, employees, agents, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of, or are otherwise available to, the Applicant, including its officers, employees, agents, advisors or counsel. In answering each interrogatory and responding to each request, please recite the interrogatory or request preceding each answer or response. Also, identify the person providing each answer or response, including but not limited to his or her name, address, employer, current position and a statement of professional qualifications.

These interrogatories and requests shall be continuing in nature. Thus, whenever any information is obtained which renders any previous response incorrect or incomplete or indicates that a response was incorrect or incomplete when made, the Applicant is hereby requested to supplement its previous response to the

appropriate interrogatory or request to produce.

The term "document" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. CPG/GANE requests that at dates to be agreed upon, the Applicant make available for inspection and copying all documents subject to the requests set forth below.

#### Requests for Documents

Pursuant to 10 CFR Section 2.741, CPG/GANE requests Applicant, by and through its attorneys, make available for inspection and copying, at a time and location to be designated, any and all documents of whatsoever description identified in the responses to the Intervenor's interrogatories below, including but not limited to:

- (1) any written record of any oral communication between or among Applicant, its advisors, consultants, contractors, agents, attorneys, and/or any other persons, including but not limited to the NRC staff, the Intervenor, and their advisors, consultants, contractors, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letters, memoranda, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to work papers, prior drafts and notes of meetings.

If Applicant maintains that some documents should not be made available for inspection, Applicant should specify the documents and explain why such are not being made available. This requirement extends to any such document, described above, in the possession of or available to the Applicant, its advisors, consultants, agents or attorneys.

#### Interrogatories

Pursuant to 10 CFR Section 2.740(b), CPG/GANE requests the Applicant by and through its attorneys answer separately and fully in writing, under oath or

affirmation, by persons having knowledge of the information requested, the following interrogatories.

A. General Interrogatories

The following interrogatory applies severally to each of the contentions admitted as issues in controversy in this proceeding: CPG/GANE Contentions 7, 8, 10, 11, 12 and 14.

1. Please identify (by name, business address, occupation and employer) a) all individuals who have knowledge or information responsive to each interrogatory and designate the interrogatory or the part thereof which that individual answered; and b) each person you expect to call as an expert witness in this proceeding as well as a brief description of the subject matter on which that person is expected to testify and the substance of that testimony, the witness's educational and professional background, and the identity of any previous proceedings in which that person has testified.

B. Interrogatories Relating to CPG/GANE Contention #7

1. Please characterize the hydrology from the surface at and within twenty-five miles of the Vogtle site downward through the Tuscaloosa aquifer (including the Lisbon Sand Formation and other overlying and underlying water formations). Specify both the techniques used to characterize the hydrology and describe the data using scientific inference, i.e., ranges of uncertainty, etc.

2. Describe each study or test the Applicant has conducted to assure that the underlying clays will prevent penetration of radioactive spills into the groundwater. Please provide copies of the tests and the test results.

3. a. Where is the Tuscaloosa Aquifer located?

b. Discuss the hydraulic confinement of the Tuscaloosa Aquifer under Plant Vogtle and to a distance of 25 miles from the plant site.

c. Where does it interact with other groundwater under the Plant Vogtle site

and within twenty-five miles of the Plant Vogtle site?

4. a. What wells have been dug on and within twenty-five miles of the Plant Vogtle site? Include complete descriptive data on any wells in this area (e.g., well depth, water pressure, casing description, construction, water analysis, etc.) and similar data on other types of surface penetrations within the area.

b. What measures has the Applicant taken to assure that it has identified all such wells?

c. What measures has the Applicant taken to assure that none of such wells have penetrated the aquifer?

d. What measures has the Applicant taken to assure that such wells will not provide a route for penetration of the aquifer?

5. Where are the connections between the various aquifers under and within twenty-five miles of the Plant Vogtle site located?

6. Please list all ground water contamination discovered at Plant Hatch and all studies of the tritium contamination of groundwater at Plant Hatch.

7. What provisions has the Applicant made for long-term monitoring of the surface water and groundwater on and within twenty-five miles of the Plant Vogtle site-- before, during and after operation of the plant?

8. a. What is the Applicant's scientific basis for calling marl a "heavy clay"?

b. What is the Applicant's basis for saying marl is "impermeable"?

c. What reports support these positions?

9. What consideration has the Applicant made of the Lisbon Sand Formation aquifer?

10. Describe each test or study the Applicant has conducted that relates to spillage from the Vogtle Plant, including but not limited to spillages flowing to the Mathis Pond and hence to the Savannah River.

11. Describe the distinctions (if any) between the subsurface underlying Plant Vogtle and the Savannah River Plant.

12. Characterize the movement of meteorological water infalling on and within

twenty-five miles of the Vogtle site; this data should be categorized by the effects due to surface collection (e.g. of rainwater), to surface runoff, to percolation, etc. What effect will the presence of Plant Vogtle have on meteorological percolation rates and subsequent increased migration of surficial contamination vectors?

13. Characterize the liquid waste flow systems for Plant Vogtle (by type, flow rates, effluent, flow containment, logistics, system physical description, mass-energy balances, etc.). Specifically include a discussion of the potential for failure at each point and the consequences thereof.

14. Please identify and describe the characteristics of each natural soil column for Plant Vogtle waste management (including radioactive and hazardous waste).

15. a. What is the current well data base?

b. What is the normalized (historical) well data base?

16. What is the statistical inference of possible Plant Vogtle groundwater (including aquifers) contamination compared to national contamination statistics?

17. The Three Mile Island accident resulted in the use of clean-up water that itself became contaminated. What provisions for clean-up water (source, storage, etc.) has Applicant made for a similar emergency at Plant Vogtle? What would be the consequences to groundwaters under and within twenty-five miles of Plant Vogtle if such an emergency arose?

18. Describe all tests, studies, analyses or surveys

a. of the geologic fracture zones which provide transfer between surface water and surficial and deep aquifers on and within twenty-five miles of the Plant Vogtle site;

b. of concentrations of radionuclides and toxic substances in surficial and deep aquifers on and within twenty-five miles of the Plant Vogtle site; and

c. that consider the cumulative effects of the operation of the Savannah River



Plant and Plant Vogtle on the groundwater and aquifers.

19. Describe all provisions, plans and measures of the Applicant to monitor and observe the migration of contamination in the ground at and within twenty-five miles of the Plant Vogtle site.
20. To what extent was Cook's study (reference 5, groundwater, FSAR) relied upon in the Applicant's conclusions? How was his data updated?
21. What surface data from Cook's study are extrapolated into the subsurface analysis?
22. Water quality analyses listed in the FSAR are 13 years old and appear to represent the results of a one-time-only analysis. Justify this one-time-only analysis. What, if any, more recent analyses have been conducted?
23. What geophysical well log data from the State of Georgia Geological Survey and the U.S.G.S. were used by the Applicant? Why are they not listed in the FSAR? If none were used, what is the Applicant's justification for not using them?
24. What is the source of Table 2.4.12-7 (FSAR)? On what basis are the listed aquifers identified? Were the wells compared with subsurface geologic maps?
25. Is the reference in Table 2.4.12-7 (FSAR) to "observation wells in the marl aquiclude" correct? Why do wells drilled to an aquiclude have a large enough flow of water in them to obtain water levels that are nearly the same as levels obtained from wells drilled into the aquifers listed?
26. On page 2.4.12-10, paragraph 3, FSAR, Applicant states that the Huber Fm (Paleocene) does not constitute an effective aquiclude and the Tertiary and Cretaceous aquifers are hydraulically interconnected. Does this mean that if contaminated waters are released at the surface, groundwater contamination will result? Provide the bases for the response.
27. What is the basis of the Applicant's statement that "the water table aquifer...lies largely within the exclusion radius of the plant (Applicant's Response to GANE and CPG Supplements to Petitions for Leave to Intervene, p. 43)?

28. What is the basis of the Applicant's statement that radioactive spillage "could be intercepted" in the Mathes Pond (Applicant's Response to GANE and CPG Supplements to Petitions for Leave to Intervene, p. 43)?

29. What is the basis of the estimate that the time of migration of a spill to Mathes Pond would be "on the order of 350 years" (Applicant's Response to GANE and CPG Supplements to Petitions for Leave to Intervene, p. 43)?

30. What is the basis for the Applicant's statement that "the water table aquifer is isolated on an interfluvial high and is intercepted by Beaverdam Creek" (Applicant's Response to GANE and CPG Supplements to Petitions for Leave to Intervene, p. 44)?

31. Discuss the withdrawal of water underlying and within twenty-five miles of Plant Vogtle and the consequences (e.g., groundwater contamination rates, aquifer depletion, etc.) for the short and long term at the postulated withdrawal rates.

32. Discuss the effects of all cooling water storage on the possibility of causing radioactive/hazardous groundwater contamination?

C. Requests to Produce Relating to CPG/GANE Contention #7

1. Please produce all information relating to each well listed in Tables 2.4.12 - 7 of the VEGP-FSAR as well as other wells on and within twenty-five miles of the Plant Vogtle site, including:

- a. the location and type of each well;
- b. lithologic logs developed in the field or elsewhere during the drilling of each well;
- c. sampling intervals (including split spoon or shelby tube cores);
- d. depths;
- e. screened intervals;
- f. other construction details (including sand packs, plugs and grouting);
- g. any and all maps showing the location of the wells.

2. Please produce all permeability data from geologic material at and within twenty-five miles of the Plant Vogtle site including
  - a. method of permeability analysis; and
  - b. areal and vertical location of the measured interval.
3. Please produce all transmissivity data from geologic material at the Plant Vogtle site.
4. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) to Applicant's knowledge which tend to support, contradict or otherwise relate to any answer to the interrogatories included above.

D. Interrogatories Relating to CPG/GANE Contention #14

1. What tests of the TDI generators will be performed by the Applicant, and at what power levels, before Plant Vogtle comes on line?
2. What will the testing schedule for the generators be during operation of Plant Vogtle?
3. What actions has the Applicant taken to prevent problems with its TDI generators in the following areas: Piston crown separation; piston skirt cracks; fuel line failures/fire; cylinder head cracks; turbocharger problems; push rod cracks; generator short due to engine fastener failure; air starting valve problems; jacket water pump problems; fuel oil lines rupturing; crankshaft failures; connecting rod bearing failures; fastener failures; excessive bearing wear; cracks in push rod welds; cracks in connecting rods; and cylinder blocks?

E. Requests to Produce Relating to CPG/GANE Contention #14

1. Please provide a copy of the Applicant's response to all questions from the NRC staff regarding Transamerica Delaval, Inc. (TDI) generators, including but not limited to questions asked with the letter from Elinor G. Adensam, Branch Chief,



Licensing Branch 4, to Mr. Donald Foster, Vice President and General Manager for Georgia Power, dated December 29, 1983.

2. Please provide copies of any reports, memoranda, letters or other materials between the Applicant and TDI concerning the adequacy of the TDI generators.
3. Please provide copies of all meeting notices, meeting transcripts, meeting minutes and correspondence between the TDI Owners' Group and the Applicant, the TDI Owners' Group and the NRC staff, and between the Applicant and the NRC staff.
4. Please provide copies of all QA/QC reports in the Applicant's possession concerning the TDI generators.
5. Please provide any information in the Applicant's possession concerning starting problems with TDI generators.
6. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) to Applicant's knowledge which tend to support, contradict or otherwise relate to the interrogatories included above.

F. Interrogatories Relating to CPG/GANE Subcontention #10.1

1. What are the dose rates that have actually been used in the Applicant's testing program?
2. Are these dose rates considered normal rates for equipment under standard operating conditions?
3. a. What dose rates would be encountered under accident conditions?  
b. What are the assumptions for this design basis accident?
4. How did the Applicant determine what dose rate(s) should be used for qualification of equipment?
5. How did the Applicant determine which equipment should be tested at different dose rates?
6. Does the Applicant anticipate any major changes that would affect testing in

this area? If so, describe these changes.

7. a. What is the derivation of the list of equipment that includes material expected to be subject to dose rate effects as outlined in NUREG/CR-2157? Justify that this list is complete and does not overlook any safety related equipment.

b. Are all of these components being tested or planned to be tested for dose rate effect? If not, provide an explanation for the Applicant's failure to test.

G. Request to Produce Relating to CPG/GANE Subcontention #10.1

1. Supply a list of all equipment that include material expected to be subject to dose rate effects, as outlined in NUREG/CR-2157.

2. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) which to Applicant's knowledge tend to support, contradict or otherwise relate to any answer to the interrogatories included above.

H. Interrogatories Related to CPG/GANE Subcontention #10.2

1. What are the detailed conditions used in synergistic testing of cables?

2. Are these conditions considered to simulate normal or accident parameters?

3. Explain why these conditions were chosen and cite all studies that were considered (internal and external).

4. In this analysis of synergistic effects, have all variables that normally affect the aging of materials, e.g. heat, humidity, light, radiation (of all expected types), atmospheric composition, etc., been considered? Cite all relevant studies and justify why any variables were either not studied or eliminated from consideration.

5. Since other equipment besides cable that contain PE or PVC would be expected to be susceptible to synergism, have they all been tested in this program? If not, please list the equipment that has not been tested and provide an explanation for Applicant's failure to test.

I. Request to Produce Relating to CPG/GANE Subcontention #10.2

1. Provide a list of all components besides cables expected to be susceptible to synergism.
2. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) which to Applicant's knowledge tend to support, contradict or otherwise relate to any answer to the interrogatories included above.

J. Interrogatories Relating to CPG/GANE Subcontention #10.3

1. Give a full and complete analysis of the Applicant's program to study the performance of EPR cable material.
2. How does this take into account cable with single/multiconductor configurations?
3. a. Are samples from every batch or production run of cable tested?  
b. What are the Applicant's sampling methods? How are these justified?  
c. How many samples of cable have already been tested?

K. Request to Produce Relating to CPG/GANE Subcontention #10.3

1. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) which to Applicant's knowledge tend to support, contradict or otherwise relate to any answer to the interrogatories included above.

L. Interrogatories Relating to CPG/GANE Subcontention #10.5

1. a. Under what conditions were solenoid valves tested for environmental qualification, and what results were obtained?  
b. Do these conditions represent normal or accident conditions?  
c. Justify why these conditions and testing results are adequate to insure the safety of the plant (e.g. how long will accident conditions exist and the basis for

this assumption).

2. When environmentally qualified valves are obtained, what type of maintenance and surveillance program will be use to insure that these valves remain qualified throughout the life of the plant?

3. Has the testing program taken into account the physical orientation of all of the solenoid valves that must be qualified?

4. a. If physical orientation has been considered, describe the testing program that provided this information.

b. If physical orientation has not been considered, justify why this important variable has been eliminated.

M. Request to Produce Relating to CPG/GANE Subcontention #10.5

1. Provide a list (model number and location in plant) of all solenoid valves that should be environmentally qualified.

2. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) which to Applicant's knowledge tend to support, contradict or otherwise relate to any answer to the interrogatories included above.

N. Interrogatories Relating to CPG/GANE Subcontention #10.7

1. a. Are there any types of transducers or sensors important to the proper functioning of the Plant Vogtle electric type hydrogen recombiner in an accident environment that require environmental qualification testing?

b. If so, what testing is planned or completed and with what results?

2. a. If environmental qualification testing in an accident environment of an entire prototype recombiner is not required, what is the basis for this conclusion?

b. If such testing is planned or has been completed, what is the nature of the test and what criteria exist for assessing the adequacy of the test results?

3. If such testing of either the entire recombiner or its components does not

include post-LOCA steam and spray exposure, justify this lack of testing.

4. What is the operating experience with this type of recombiner in other plants?
5. Give a full and complete analysis of how this recombiner (the whole system) will avoid the problems encountered during the accident at Three Mile Island in which the recombiner system could not be used.
6. What type of maintenance and surveillance program will be used to insure that the recombiners will remain qualified throughout the life of the plant?

O. Request to Produce Relating to CPG/GANE Subcontention #10.7

1. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) which to Applicant's knowledge tend to support, contradict or otherwise relate to any answer to the interrogatories included above.

P. Interrogatories Relating to CPG/GANE Contention #11

1. Give a full and complete analysis of how the steam generators to be installed at Plant Vogtle will avoid the problems seen in other Westinghouse steam generators in regards to tube failures caused by vibration-induced fatigue cracking and by bubble collapse.
2. Give a full and complete analysis of how the all volatile treatment (AVT) will eliminate the problems seen in other Westinghouse steam generators with regards to general corrosion, stress corrosion cracking, denting and tube thinning. This analysis will include, but not necessarily be limited to: all relevant studies; a summary of all important empirical data; a statement of the conditions under which the AVT is effective and conditions under which it is not effective; an explanation of how conditions at Plant Vogtle will be controlled so the AVT will be effective for the life of the plant.
3. Give a full and complete analysis of the Applicant's maintenance and



surveillance program in regards to the Westinghouse steam generator.

4. Justify the procedures stated in the current Operators Manual for Emergency Action during a steam generator tube rupture (SGTR), using technical reports and any other information you have available.
5. Under what conditions would a SGTR accident cause activation of the ECCS? What additional problem would this cause in the management of the SGTR accident?
6. Based on several different levels of severity including the most severe case, what would be the expected consequences of a SGTR accident? Give details of all of the assumptions made, and include a worst case analysis.
7. How many Westinghouse steam generators have experienced significant degradation of tubes resulting in tube leaks?
8. Identify each reactor employing Westinghouse steam generators which has experienced tube leaks.
9. What data does the Applicant possess on the frequency and severity of tube leaks in reactors equipped with Westinghouse steam generators?
10. What are the bases for the Applicant's responses to 7 through 9 above?
11. How many tube ruptures have occurred at reactors employing Westinghouse steam generators?
12. At which reactors employing Westinghouse steam generators have (a) steam generator tubes been plugged; (b) steam generator tubes been sleeved; or (c) lower steam generator assemblies been replaced?
13. Identify any additional reactors employing Westinghouse steam generators where the operators or owners anticipate (a) plugging steam generator tubes; (b) sleeving steam generator tubes; or (c) replacing the lower steam generator assemblies.
14. What are the Applicant's bases for the responses to 11 through 13 above?
15. a. Is Applicant aware of any litigation in which its supplier Westinghouse is involved in which it has been alleged that there have been defects or deficiencies in the design, manufacture or operation of Westinghouse steam generators?

b. Please identify each such litigation, the parties involved and the allegations made.

Q. Request to Produce Relating to CPG/GANE Contention #11

1. Provide copies of the current and all previous revisions of the Operators Manual for Emergency Action during a steam generator tube rupture accident.
2. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) which to Applicant's knowledge tend to support, contradict or otherwise relate to any answer to the interrogatories included above.

R. Interrogatories Relating to CPG/GANE Contention #12

1. Give a complete and detailed analysis of how a salt drift rate of 305 lb/acre/year was estimated in the CP-FSAR, and salts drift rates of 31 and 21 lb/acre/year were estimated in the OL-ER. What models, equations and data are used in the new and old calculations of salt drift emissions?
2. Are these rates based on operating plants? If so, justify why Plant Vogtle would be similar to those used for comparison.
3. a. Give a complete and detailed analysis of all information in possession of the Applicant on the effects of salt drift on vegetation.  
b. Cite all relevant studies and summarize empirical information related to this problem.
4. Give a complete and detailed analysis of the expected releases of chlorine from the cooling towers. Explain the chemistry of the system in relationship to these expected releases.
5. Has new information concerning corbicula been obtained since the granting of the Construction permit? If so, provide a summary of that information.
6. Has the Applicant increased its levels of chlorine in response to the presence

of corbicula? If so, to what levels? How has the environmental impact of this increase been quantified by Applicant?

7. What evidence does the Applicant have to demonstrate that its models and equations of salt and chlorine drift have been tested and found adequate and accurate for all conditions at Plant Vogtle?

8. Has the Applicant catalogued and evaluated agricultural land use and natural ecosystems surrounding Plant Vogtle and accounted for all possible routes of salt and chlorine contamination of these systems? If so, please provide this catalogue and evaluation for CPG/GANE's inspection.

9. What are the surface and surficial aquifer transmissions from the cooling tower effluent?

5. Request to Produce Relating to CPG/GANE Contention #12

1. Provide all information in possession of the Applicant on the expected effects on the environment of salt emissions.
2. Provide all information in the Applicant's possession relating to the presence or potential presence of corbicula in the water taken from the Savannah River.
3. Provide all information in possession of the Applicant on the expected effects on the environment of chlorine emissions.
4. Provide all micrometeorological data available to predict atmospheric transport of salt and chlorine from the cooling towers.
5. Please provide copies of all tests, test results, studies, memoranda, scientific treatises and other reports or information (whether published or not) which to Applicant's knowledge tend to support, contradict or otherwise relate to any answer to the interrogatories included above.

Respectfully submitted,

*Tim Johnson*

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UNITED STATES OF AMERICA  
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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(Vogtle Electric Generating Plant,  
Units 1 and 2)

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Docket Nos. 50-424 and 50-425

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing 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 10th day of October, 1984.

*Tim Johnson*

Tim Johnson  
Campaign for a Prosperous Georgia

SERVICE LIST

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