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RELATED CORRESPONDENCE

January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

15 410:13

Before the Atomic Safety and Licensing Board

In the matter of	:	
	:	
GEORGIA POWER COMPANY, <u>et al.</u>	:	DOCKET NUMBERS 50-424 <span style="float: right;">OL</span>
	:	and 50-425
(Vogtle Electric Generating	:	
Plant, Units 1 and 2)	:	

APPLICANTS' RESPONSE TO INTERVENORS'  
SECOND SET OF INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS

On December 7, 1984, Joint Intervenors Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy served upon Applicants by mail their Second Set of Interrogatories and Requests to Produce. Applicants provide herein their responses to those discovery requests.

I. GENERAL OBJECTIONS

A. Objections to Instructions

Applicants object to the preliminary instructions contained in Intervenors' Second Set of Interrogatories and Requests to Produce to the extent that

1. the Intervenors seek to impose requirements upon the Applicants beyond those permitted by the Nuclear

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Regulatory Commission's Rules of Practice for Domestic Licensing Proceedings; and

2. those instructions request the production of documents protected from discovery by the attorney-client privilege or the work product privilege.

B. Objections to Interrogatories and Requests for Documents

Applicants object to any interrogatory or request for documents, or portion of an interrogatory or request for documents, which seeks information beyond that which relates to matters in controversy which have been identified by the Board in its Memorandum and Order dated November 5, 1984. See, 10 C.F.R. § 2.740(b)(1). The scope of Contention No. 8, as admitted by the Board, is stated 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.

Applicants consider to be beyond the scope of Contention No. 8 any inquiry into, or request for document concerning, a non-Contention No. 8 activity. A Contention

No. 8 activity is considered to be any one of, or combination of, the following:

1. welding;
2. documenting the placement of concrete;
3. testing concrete;
4. preparation of concrete quality test records;
5. procuring material and equipment;
6. protecting equipment; and
7. taking corrective action in response to Notices of Violation as required by the NRC.

Because Applicants object to any discovery beyond the scope of the contentions as admitted by the Board, Applicants have limited their response to Intervenor's Second Set of Interrogatories and Request for Documents to such Contention No. 8 activities. In some instances a specific interrogatory or request is entirely outside the scope of Contention No. 8. In such instance a specific objection is stated and no answer is given or no document will be produced.

## II. SPECIFIC RESPONSES:

### A. General Interrogatories:

A-1.

Question:

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.

Response:

a) Objection. Applicants object to this Interrogatory because it is vague, confusing and not susceptible to a proper response. To the extent this Interrogatory requests information about persons other than those who have provided information used by Applicants in responding to these discovery requests, it is overly broad, burdensome, and oppressive. Subject to these objections, those who provided answers to these interrogatories are identified in the attached affidavits.

b) Applicants currently have not identified an expert whom they will call as a witness in this proceeding. To the extent it is required, this response will be supplemented as required by the NRC Rules of Practice for Domestic Licensing Proceedings.

B. Interrogatories Relating to  
CPG/GANE Contention No. 8

T-1.

Question:

When the Applicant recently fired employees involved in procurement due to allegations of bidrigging, what investigations were performed to assure that quality of materials and work was not affected as well as pricing? What was the result of these investigations? Please provide details, including copies of the investigation results.

Response:

Objection. Applicants object to this interrogatory because it calls for information which is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to discovery of admissible evidence. It is entirely beyond the scope of Contention No. 8, as admitted by the Board. In its Memorandum and Order dated November 5, 1984, the Board rejected Intervenor's request to add the procurement irregularities in question as a basis for Contention No. 8. Therefore, they are not a proper matter for inquiry.

T-2.

Question:

How were vendors approved for the Qualified Vendors List? Describe in detail any and all methods for choosing qualified vendors.

Response:

VEGP does not have a document called a "Qualified Vendors List," but rather evaluates potential suppliers and successful bidders on a case-by-case basis for each purchase. The list of bidders is generally selected from a master list of suppliers (an Evaluated Supplier List or ESL) who have been evaluated and proven to have an acceptable QA Program for the equipment or materials which are being procured. However, prior to actually awarding a purchase order and/or beginning work, the supplier's QA Program is reviewed extensively, including appropriate detailed procedures, to assure that the program meets VEGP quality requirements. This review is conducted by qualified QA personnel in the Georgia Power Company, Southern Company Services or Bechtel Power Corporation organizations.

T-3.

Question:

What provisions does the Applicant have for auditing vendors to assure compliance with contract specifications and QA/QC requirements?

Response:

The provisions utilized by Applicants for auditing vendors to assure compliance with contract specifications and QA/QC requirements are described in detail in PSAR and FSAR Chapters 17, 17.1, 17A, 17B and 17C.

In summary, Applicants have established an audit program for the VEGP which encompasses, as applicable, design, procurement, construction and preoperational testing activities of Georgia Power Company, Southern Company Services, Bechtel Power Corporation, Westinghouse and site contractors. This program is under the direct supervision of the Vogtle Quality Assurance Manager ("VQAM") who personally conducts certain audits, and observes selected audits performed by others. The VQAM has responsibility for the audits conducted on VEGP activities and has final authority on any matters relating to the conduct of any audit.

The Applicants' Quality Assurance Manual and the internal procedures of the VQAM office outline the way in which the various audits are conducted. The audit procedures require that the following be accomplished for all audits conducted or observed by the VQAM.

- A. Preparation of audit agendas or checklists.
- B. VQAM approval of audit agendas or checklists.
- C. Preparation of audit report with suitable means for identifying open items.
- D. VQAM approval and appropriate distribution of audit reports.

The specific audits applicable to the VEGP program are described in FSAR Subsection 17.1.18.1. Among the audits performed or observed by the VQAM to provide a comprehensive verification and evaluation of all phases of the VNP

QA program activities are Vendor Audits. In conjunction with their surveillance activities, the Bechtel Power Corporation Procurement Supplier Quality Department and the Southern Company Services Quality Assurance Department conduct planned audits of selected suppliers. Checklists, as referenced in their respective department manuals, are used during these audits. The VQAM receives from the Southern Company Services Project Quality Assurance Engineer the schedule of planned audits, and for selected audits the VQAM or his representative accompanies the audit team. A preaudit meeting is held prior to each audit, and any specific questions of Georgia Power Company or Southern Company Services are given to the audit team leader. The VQAM participation is to assure the adequacy of the supplier's quality assurance program and to assure the effectiveness of the Bechtel Power Corporation audit.

An exit interview is held at the conclusion of each audit, and recommendations or discrepancies are presented to the supplier's management. Open items are listed in the audit report and are re-audited. The VQAM receives copies of audit and re-audit reports. Any Georgia Power Company questions or comments on the audit or re-audit reports are resolved through the Southern Company Services Project Quality Assurance Engineer.

The VQAM assures that Southern Company Services, Bechtel Power Corporation and Westinghouse implement an audit program for their assigned work scope. This

includes internal audits of activities on VEGP and audits of subcontractors or suppliers.

T-4.

Question:

Have any employees or bidders alleged that political or personal favoritism has resulted in preferential treatment being given to some contractors? Please provide details.

Response:

Objection. Applicants object to this interrogatory because it calls for information which is not relevant to the subject matter of this proceeding and is not calculated to lead to the discovery of admissible evidence. It is entirely beyond the scope of Contention No. 8 as admitted by the Board.

T-5.

Question:

Has any contractor, including but not limited to Westinghouse Corporation and Bechtel, taken officials of the Applicant on trips to Europe or provided other benefits to them? Please provide details.

Response:

Objection. Applicants object to this interrogatory because it calls for information which is not relevant to the subject matter of this proceeding and is not calculated to lead to the discovery of admissible evidence. It

is entirely beyond the scope of Contention No. 8 as admitted by the Board.

T-6.

Question:

How often has the Applicant been cited for violation of NRC rules, regulations and procedures at Plant Vogtle since the construction permit was issued? How many violations were at each severity level?

Response:

As of the date of this Response, Applicants have been cited for violation of NRC rules, regulations or procedures at Plant Vogtle a total of thirty-one (31) times since the construction permit was issued. These included two (2) deviations and nine (9) infractions. There were five (5) violations involving severity Level IV, thirteen (13) at Level V, and two (2) at Level VI.

T-7.

Question:

Describe in detail any such violations which were at the most severe, second most severe, or third most severe level of violation.

Response:

None.

T-8.

Question:

For each contractor or subcontractor at Plant Vogtle, briefly describe the area and type of work they are

responsible for, given the date on which they became involved with Plant Vogtle, and if their contract has been terminated, the date of and reason for termination.

Response:

A document identified as "Alvin W. Vogtle Electric Generating Plant Labor Contract History as of 1/08/85" will be produced at VEGP at a mutually convenient time in lieu of a narrative response to this interrogatory and in Response to Request for Production of Documents No. 9.

T-9.

Question:

Who is responsible for training workers (laborers, craftspeople, inspectors, etc.) at the plant: the Applicant, Bechtel, the individual contractor/subcontractor or the union?

Response:

Most skilled workers at VEGP came to work having already acquired their skill. Their initial training may have come from any number of sources. However with regard to training of workers at the Plant, training (of laborers, craftspeople and inspectors) is conducted by their respective contractor-employer. (See also, Response to Interrogatory No. 10, infra.) In some instances, a third party is utilized because of a particular experience and expertise. Georgia Power Company is responsible for training Georgia Power Company inspectors.

Question:

What assurance is there that workers are properly trained and qualified before they are permitted to do their work? List all recognized industrial standards (e.g. ANSI) for the training of workers which are applicable to Plant Vogtle and indicate how they are being met.

Response:

To assure itself the greatest potential for obtaining quality workers, Georgia Power Company has utilized organized labor for most of its construction projects. Accordingly, Georgia Power Company entered into the Vogtle Project Agreement (VPA) with organized labor to construct VEGP thereby assuring itself an adequate supply of skilled labor.

For activities affecting quality, on-site training is formulated in harmony with accepted industry standards, Bechtel design specifications and/or manufacturer instructions, and Vogtle project procedure, as appropriate to the particular activity.

Craftsmen performing activities which affect quality items receive classroom and in some instances hands-on training and testing. For some training, craftsmen are issued a wallet card signifying their qualification to perform those activities and their qualification date.

Inspectors are certified at the site by authorized individuals. The inspector must have the experience in

his/her area of certification as required by ANSI, pass a certification exam and be observed through on the job training by his/her immediate supervisor prior to certification. The inspector's immediate supervisor, the organization responsible for training and administering the exams, and the authorized individual for certification must all agree that the individual is fully qualified before the inspector is certified and released to perform inspections.

Workers are trained to perform work to recognized industrial standards. Those standards which are applicable to Contention No. 8 activities at VEGP include:

- (a) ASME Section IX and B31.1 - Welding;
- (b) AWS D.1.1 - Welding;
- (c) ANSI 45-2.2 and 45-2.3 - Housekeeping and Equipment Storage and Maintenance;
- (d) AWS 39.1 - Welding;
- (e) SMACNA - H.V.A.C.;
- (f) ACI - Concrete;
- (g) NRMCA - Concrete;
- (h) CRD - Concrete.

Georgia Power Company regularly provides professionally instructed training classes for craft supervisors.

The applicable standards for training Georgia Power Company quality control inspectors are as follows:

- (a) ANSI-N45.2.6 - 1978;

(b) Regulatory Guide 1.58 - September, 1980;

(c) ASNT SNT-TC-1A - 1980;

T-11.

Question:

Have there been any allegations of harassment or intimidation of inspectors at Plant Vogtle? If so, list each such incident and provide details.

Response:

Objection. Applicants object to this interrogatory because it calls for information which is not relevant to the subject matter of this proceeding and is not calculated to lead to the discovery of admissible evidence. It is entirely beyond the scope of Contention No. 8 as admitted by the Board.

T-12.

Question:

List every act of vandalism directed at the structure of Plant Vogtle or components thereof, giving the date, extent and location of each incident, and explain how the vandalism was discovered.

Response:

Objection. Applicants object to this interrogatory because it calls for information which is not relevant to the subject matter of this proceeding and is not calculated to lead to the discovery of admissible evidence. It is entirely beyond the scope of Contention No. 8 as admitted by the Board. Further, Applicants state that

this interrogatory is vague and confusing and it does not lend itself to response.

T-13.

Question:

Have any engineering change notices been generated at Plant Vogtle due to the use of equipment that could not meet the original specifications? Provide details.

Response:

Applicants do not use any procedure which is known as an "engineering change notice." Accordingly, strict answer to this interrogatory would be negative. However, with the understanding that intervenors may be referring to the type of notice which is generated at VEGP pertaining to deviations from original equipment specifications, Applicants offer the following response. Any equipment which is received at VEGP which does not meet the specification requirements is reported on a "deviation report." Copies of these deviation reports as well as the disposition of that deviation (which in loose terms may be what the Intervenor characterize as an "engineering change notice") are included within those documents produced in response to Requests for Production of Documents No. 21. The appropriate response to this interrogatory can be gathered by Intervenor by a review of those documents. Accordingly, Applicants will make those documents available at VEGP at a mutually convenient time, both in

response to Request for Production of Documents No. 21, as well as in response to this interrogatory.

T-14.

Question:

What vendors have been replaced? Why? Provide details, including reasons for replacement, name and address of vendor, name and telephone number of contact person for vendor, and other relevant information.

Response:

Objection. Applicants object to this interrogatory because it is vague and confusing and incapable of response. During the course of the construction of VEGP, new materials and equipment are customarily purchased through a purchase order which is a one-time contract for those items. Different vendors and different suppliers may be used from time to time as the supplier of material and equipment, and the decisions of whether to purchase from supplier A as opposed to supplier B is made based upon a myriad of factors such as price, availability of supplies, and ability to deliver in a timely fashion. Applicants do not consider a vendor to have been "replaced" when a subsequent purchase order for similar items is placed with a different supplier.

To the extent this interrogatory seeks information regarding vendors who have been replaced during the course of an open purchase orders or before the contract is completed, Applicants state that they do not maintain any

records which would readily reveal the information requested. However, after conducting reasonable inquiry, Applicants are aware of only one vendor which has been so replaced. ABC Cutting Contractors of Atlanta, Inc., 4787 Clark Howell Highway, No. 3, College Park, GA 30349, (404) 768-0965, was allowed to terminate its contract with Georgia Power Company on or about August 27, 1983. The reason for allowing ABC Contractors to terminate its agreement with Georgia Power Company was not related to its quality assurance program, and ABC Contractors did not leave any unsafe condition at VEGP.

Accordingly, Applicants further object to the remainder of this interrogatory because it does not call for information which is relevant to the subject matter of this proceeding, and it is not reasonably calculated to lead to the discovery of admissible evidence.

T-15.

Question:

Have any procedures been changed (either applicants' or contractors') because workers were unable to comply with the original procedures? Provide details.

Response:

No.

T-16.

Question:

What impact on quality of workmanship resulted from alleged use of drugs by construction employees? Following

the arrest of plant workers on drug charges, what studies, analyses or other action did the applicants take to assure that quality and safety were maintained in the construction of plant? What were the results of these studies, analyses or other action? Provide details, including copies of any reports.

Response:

Applicants object to the inquiry set forth in Interrogatory No. 16 on the ground that it seeks information beyond the scope of that which is relevant to the subject matter of this proceeding and it is not reasonably calculated to lead to the discovery of admissible evidence. It is entirely beyond the scope of Contention No. 8 as admitted by the Board.

Subject to this objection, Applicants state that there has been no detrimental impact on the quality of workmanship resulting from the alleged use of drugs by construction employees at VEGP. Applicants further state that the quality control and quality assurance procedures at VEGP, as written and as implemented with regard to Contention No. 8 activities, provide for quality control and quality assurance regardless of whether the particular worker is under the influence of drugs at the time of the work. If the work meets the standards of quality, it is accepted. If it is not acceptable, regardless of the reason, it is rejected.

T-17.

Question:

Have any workers been fired for any reason by the applicant and/or its contractors/subcontractors following allegations of poor construction or QA practices at Plant Vogtle they made to the NRC, news media, or any other person or entity? Provide details.

Response:

Objection. Applicants object to Interrogatory No. 17 on the ground that it seeks information beyond the scope of that which is relevant to Contention No. 8 as admitted by the Board. Applicants also object to this interrogatory on the ground that it is burdensome and oppressive and vague and incapable of response. Subject to these objections, Applicants state that no worker has been fired as a result of having made allegations to anyone of poor construction or QA practices at VEGP.

T-18.

Question:

Describe procedures for pouring concrete during all weather conditions, including all measures for protection of quality assurance.

Response:

Objection. Applicants object to this Interrogatory on the ground that it is vague, confusing and incapable of complete response. Further, it calls for information which is beyond the scope of Contention No. 8, as admitted

by the Board because it is not limited by time, location or relation of the contractor to VEGP.

However, subject to this objection, Applicants state that the procedure for pouring concrete during adverse weather conditions is set forth in Procedure No. CD-T-02, a copy of which will be produced in lieu of a narrative response to this interrogatory.

T-19.

Question:

Describe procedures for welding during all weather conditions, including all measures for protection of quality assurance.

Response:

Objection. Applicants object to this Interrogatory on the ground that it is vague, confusing and incapable of complete response. Further, it calls for information which is beyond the scope of Contention No. 8, as admitted by the Board because it is not limited by time, location or relation of the contractor to VEGP.

However, subject to this objection, Applicants state that the procedures for welding by these who generally and routinely perform such tasks at VEGP are set forth in the following written procedures which will be produced in lieu of a narrative response to this interrogatory:

(a) CB&I General Welding Procedures Specification for Stud Welding Process, GWPS-StudX (REV. 13);

- (b) Georgia Power Company Plant Vogtle Units 1 & 2  
Generating Plant Construction Procedure GD-T-13  
(General Welding Control);
- (c) Georgia Power Company Plant Vogtle Units 1 & 2  
Generating Plant Construction Procedure GD-T-14  
(Distribution, Field Storage, and Handling of Welding  
Material);
- (d) Nuclear Installation Services Company General  
Welding Procedure E.S. #300;
- (e) Pullman Power Products General Welding Standard  
GWS-D1.1;
- (f) Pullman Power Products General Welding Standard  
GWS-III/I;
- (g) Pullman Construction Industries/KenithFortson  
Company, a joint venture Procedure for Gas Metal Arch  
Welding-Carbon Steel, #FWP-9GZ-299;
- (h) Pullman Construction Industries/KenithFortson  
Company, Inc., a joint venture Procedure for Stud  
Welding, V-FWP-310;
- (i) Pullman Construction Industries/KenithFortson  
Company, Inc., a joint venture Procedure for FCAW  
C/S-C/S Galvanized No. FWP 400;
- (j) Pullman Construction Industries/KenithFortson  
Company, Inc., a joint venture Procedure for Produc-  
tion Welding of sheet and structural steel, No. JP-9.4.

The measures taken for protection of quality assurance  
with regard to welding are set forth in PSAR and FSAR

Chapter 17, which is available to Intervenors as a public record. Updates of Chapter 17 of the PSAR will be provided to Intervenors in response to Request for Production No. 11.

T-20.

Question:

What is the identification of the individuals who performed the in-process testing of the plastic concrete for the Unit 1 RB basemat pour?

Response:

Paul Ryals  
John Herrington  
W. N. Gross  
Martin Peterson  
Barry Grier  
James Sursson  
Doug Clary

T-21.

Question:

What is the identification of the individuals who inspected the concrete placement for this pour?

Response:

Gracien Rodemer  
Bobby McNurr  
Luther James  
Greg Jordan

Question:

What assurance is provided that equipment stored on-site is adequately protected prior to its installation?

Response:

The procedures which govern the equipment maintenance and storage program encompass the requirements of the applicable industrial standards, design specifications, vendor recommendations, and engineering directives. The maintenance and storage sequence is as follows:

Each item of equipment (permanent plant equipment) received on-site is reviewed by the respective discipline equipment engineer who determines if the item is to be entered into the maintenance and storage program. If the equipment is entered into the program, the engineer will specify via a maintenance report card (for each item of equipment) the storage and maintenance criteria and the frequency of inspections to be performed by quality control personnel, and he will give a detailed explanation of inspection requirements.

For each inspection performed by quality control, the maintenance report card is posted with appropriate entries, dated, signed, and filed as a permanent quality document. The types of inspection requirements found on the maintenance and storage report cards are:

- (a) protective covers and seals intact to protect equipment internals;

- (b) physical damage to equipment;
- (c) environmental damage;
- (d) proper level of storage (per ANSI N45.2.2);
- (e) heat applied to internals (if required);
- (f) nitrogen purge (if required);
- (g) shaft rotations (if required); and
- (h) lubrication (as specified by the vendor).

Any non-compliance or deficiency detected at any time to an item of equipment is reported in accordance with site procedures. Corrective action is dispositioned by appropriate engineers, corrective action is performed, the equipment is reinspected by quality control to verify that the approved corrective action was taken, and the corrective action report is filed as a permanent quality document.

This maintenance and storage program serves to insure that all equipment is stored and maintained so as to remain in an "as received" condition throughout the construction phase of the Plant.

Other programs which supplement and enhance the maintenance and storage program are:

- (a) Megger Program, which is a program to test the insulation resistance of motors on a set frequency, to insure the integrity of motor windings;
- (b) Purge program, which is designed to insure that the proper nitrogen purge crushers are maintained for

all items of equipment which require a nitrogen blanket;

(c) Walk through inspections performed biweekly to insure equipment storage areas are being maintained to the required levels of cleanliness;

(d) Periodic inspection checklist (P.I.C.) performed once each month to insure that the entire plant site is being maintained to the required cleanliness standards.

Various specifications govern the inspection and maintenance of items in storage. Rather than restating a narrative summary of each of these specific procedures, they will be produced in lieu of a narrative response. These written procedures are as follows:

(a) Georgia Power Company Plant Vogtle Units 1 & 2  
Generating Plant Construction Procedure GD-T-9  
(Inspection and Maintenance of Items in Storage);

(b) Georgia Power Company Plant Vogtle Units 1 & 2  
Generating Plant Construction Procedure ED-T-09  
(Insulation Tests);

(c) Georgia Power Company Plant Vogtle Units 1 & 2  
Generating Plant Construction Procedure GD-T-17  
(Housekeeping);

(d) American National Standard Reactor Plants and their Maintenance, Packaging, Shipping, Receiving, Storage and Handling of items for Nuclear Power Plants (during the construction phase) ANSI N45.2.2;

- (e) American National Standard Reactor Plants and their Maintenance Housekeeping (during the construction phase of nuclear plants), ANSI N45.2.3;
- (f) Electrical Construction Specification for the Georgia Power Company Alvin W. Vogtle Nuclear Plant, Burke County, Georgia, Units 1 & 2, Specification No. X3AR01 Section E11 Storage and Protection of Equipment and Materials (Rev. 5);
- (g) Georgia Power Company Generating Plant Construction Department Mechanical Equipment Maintenance and Storage Program MI-A-13;
- (h) Georgia Power Company Generating Plant Construction Department Instrumentation Equipment Maintenance and Storage MI-A-23;
- (i) Georgia Power Company Generating Plant Construction Department Mechanical Purging MI-T-03;
- (j) Georgia Power Company Generating Plant Construction Department Receipt, Storage and Maintenance Program for equipment items of the steam turbine/generator package MI-T-04;
- (k) Georgia Power Company Generating Plant Construction Department Maintenance Program for Construction operated equipment MI-T-05;
- (l) Georgia Power Company Generating Plant Construction Department HVAC Equipment Maintenance Storage Program MI-T-06;

(m) Georgia Power Company Generating Plant Construction Desktop Procedure Vogtle Nuclear Plant Project Procedure No. DT-E-13 Description of EM/SL Inspection Requirements.

T-23.

Question:

What follow-up inspections have been performed, and with what results, to ascertain what damage was done to the electrical cabinets on-site? Provide details.

Response:

As stated in response to the preceding interrogatory, inspection of all equipment is an ongoing process in VEGP. When damage to the equipment has been determined, a deviation report is prepared and the appropriate procedures are followed to remedy the situation. All of the deviation reports pertaining to damage of equipment, including damage to electrical cabinets on-site, will be produced in response to Intervenor's Request for Production of Documents. Accordingly, in lieu of a narrative response to this interrogatory, Applicants offer the deviation reports in response to the Request for Production of Documents No. 21, as well as in response to this interrogatory. The information sought by Intervenor's in this interrogatory may be gathered by Intervenor's review of those documents.

Question:

What provisions does the applicant have to assure that materials are traceable if defective materials are found? Provide details.

Response:

Applicants employ the following procedures to assure that items within the scope of Contention No. 8 are traceable if defective materials are found:

(a) Weld Filler Material:

All weld filler material purchased for use at VEGP meets the requirements of ASME Section III Class I and Class II, as applicable.

When weld filler material is received on-site, it is placed on hold until all the QA documentation is reviewed and accepted by the GPC Document Review Section. This review includes verification of compliance to Purchase Order/ Specification for the Equipment/ Material, review for Certificate of Compliance (C of C) and Certified Material Test Report (CMTR), as applicable. If QA Documentation is acceptable, QC removes item(s) or material(s) from hold and item(s) or material(s) are placed in storage until requisitioned for issue to the appropriate Weld Material Distribution Center (WMDC).

Weld filler material received at the WMDC is separated into different types and sizes and stored

until issued for use. When weld material is issued, the welder identification and the weld material heat/lot/control numbers are documented on the weld rod issue log and weld rod issue ticket which are stored in the QA Records vault and are permanent plant documentation.

In the event that a batch of weld filler material that was issued to a welder is later found to be defective, the area where the defective weld material was used can be traced through review of supporting documentation, i.e. time sheet job charges, inspection reports, and/or weld rod issue logs and tickets.

(b) Safety Related Equipment:

Safety Related Equipment is received on-site at the GPC warehouse. The equipment is placed on hold until receipt inspection is performed. Once receipt inspection and document review is complete, the equipment is ready for issue. Safety related equipment is assigned a unique plant tag number. This tag number provides construction traceability.

In the event that a piece of equipment is later found to be defective, location of that equipment can be traced through the equipment tag number.

(c) Concrete materials:

Concrete materials received on-site are inspected, random samples taken for testing, and required documentation verified prior to unloading.

During production of concrete various tests are conducted to assure materials meet requirements. Fresh concrete tests are also conducted after concrete batching along with test cylinders being taken for compressive strength tests. These cylinders are traceable to the actual placement so that any below standard placements can be identified. Details for concrete work are in procedure CD-T-02 which is being produced in response to Interrogatory No. 18 above.

T-25.

Question:

Does the applicant or any of its contractors or sub-contractors maintain any quote or target system for dismissing workers? Provide details.

---Response:--

Objection. Applicants object to this interrogatory on the ground that it is beyond the scope of Contention No. 8 as admitted by the Board. Furthermore, Applicants object on the ground that this interrogatory is vague, confusing and not capable of intelligible response. Applicants are unable to interpret what the Intervenor's mean by a "quote or target system for dismissing workers."

T-26.

Question:

Does the presentation of a new Readiness Review Plan imply that the existing quality control/quality assurance

program was deficient? What changes have been proposed?  
What changes have been implemented?

Response:

No, the presentation of a new Readiness Review Plan does not imply that the existing quality control/quality assurance program was deficient and in fact, the quality control and quality assurance program is not deficient. No changes have been proposed in the QC/QA program by the Readiness Review Plan. No changes have been implemented in the QC/QA program by the Readiness Review Plan.

T-27.

Question:

What requirements exist to assure the proper training of engineers for the Applicant, its contractors and its subcontractors? Provide details.

Response:

Objection. Applicants object to this interrogatory on the ground that it is vague and confusing and incapable of intelligible response. There are many types of engineers from those who receive bachelor of science degrees to those who are called engineer by fellow workers but who do not have any sort of formal training. Accordingly, this interrogatory is incapable of response as it is drafted.

T-28.

Question:

Provide details on the cracking in the containment rack pipe welds. Why were workers not trained so as to

prevent such an occurrence? What measures have been taken to assure that similar breakdowns do not occur in other areas? Provide specific details, including specific changes in the existing QA/QC program in response to this discovery.

Response:

The details on the cracking in the containment pipe rack welds are provided in a letter from Mr. D. O. Foster to the NRC dated October 17, 1984 a copy of which has already been provided to Intervenors.

The welders performing the work are trained to deposit quality welds and are qualified in accordance with the ASME Boiler and Pressure Vessel Code Section IX, Qualification Standard for Welding and Brazing Procedures, Welders Brazers and Welding and Brazing Operators.

To prevent possible further occurrences with the installation of Unit 2 rack assemblies, the contractor will be provided an installation sequence developed by Bechtel. The contractor is now required to develop a specific fabrication procedure which will be reviewed and become part of the QA/QC program.

T-29.

Question:

What vendor provides core drilling at the site? What experience does this vendor have in this field? What training do its workers have in core drilling? Provide details.

Response:

Objection. Applicants object to this interrogatory on the ground that it seeks information which is not relevant to the subject matter of this proceeding and is not calculated to lead to discovery of admissible evidence. It is entirely beyond the scope of Contention No. 8. as admitted by the Board. The present subcontractor performing core drilling has not used that process in connection with documenting the placement of concrete, testing concrete or the preparation of correct concrete quality test records.

T-30.

Question:

What tests have been conducted on the lifting eyes of concrete hatch covers? Provide details of the testing, including results.

Response:

Objection. Applicants object to this interrogatory on the ground that it seeks information which is not relevant to the subject matter of this proceeding and is not calculated to lead to discovery of admissible evidence. It is entirely beyond the scope of Contention No. 8 as admitted by the Board. Any tests which may have been conducted on the lifting eyes of concrete hatch covers do not involve documenting the placement of concrete, the testing of concrete, the preparation of concrete quality test records, the procurement of material and equipment, or the protecting of equipment.

T-31.

Question:

What measures have been taken regarding unqualified motors in Limitorque motor-operated valves? Please provide details of the problem and the applicants' response thereto.

Response:

Objection. Applicants object to this interrogatory on the ground that it seeks information which is not relevant to the subject matter of Contention No. 8 and is not calculated to lead to discovery of admissible evidence.

T-32.

Question:

Describe in detail any problems the Applicants have experienced with the residual heat removal system, including potential consequences and measures to correct each problem.

Response:

Objection. Applicants object to this interrogatory because it calls for information which is not relevant to the subject matter of this proceeding and is not calculated to lead to the discovery of admissible evidence. Further, it is extremely beyond the scope of Contention No. 8 as admitted by the Board.

C. Request for Production of Documents  
Relating to CPG/GANE Contention No. 8

U-1.

Request:

Provide a copy of the approved qualified vendors list, qualifying letters, and qualifying materials.

Response:

Applicants do not have a document called a "qualified vendors list," or other documents such as those requested. See Response to Interrogatory No. 2, above.

U-2.

Request:

Provide copies of all internal or other audits of quality assurance/quality control at Plant Vogtle.

Response:

All such documents which are within the scope of Contention No. 8 as admitted by the Board and which pertain to Contention No. 8 activities will be produced at VEGP at a mutually agreeable time.

U-3.

Request:

Provide copies of all I & E Reports relating to quality assurance/quality control at Plant Vogtle.

Response:

All such documents which are within the scope of Contention No. 8 as admitted by the Board and which

pertain to Contention No. 8 activities will be produced at VEGP at a mutually agreeable time.

U-4.

Request:

Provide copies of all Stop Work Orders for Plant Vogtle.

Response:

All such documents which are within the scope of Contention No. 8 as admitted by the Board and which pertain to Contention No. 8 activities will be produced at VEGP at a mutually agreeable time.

U-5.

Request:

Provide copies of all contracts with A & W Oil.

Response:

Objection. Applicants object to the production of the contract with A & W Oil on the ground that it seeks information which is beyond the scope of Contention No. 8 as admitted by the Board, and thus the information contained in any such contract is irrelevant to the issues in this proceeding.

U-6.

Request:

Provide a copy of the contract for the Westinghouse NSSS.

Response:

Objection. Applicants object to the production of the NSSS contract with Westinghouse on the ground that it seeks information which is beyond the scope of Contention No. 8 as admitted by the Board, and thus the information contained in any such contract is irrelevant to the issues in this proceeding. Applicants further object on the ground that this Request calls for proprietary and confidential information.

U-7.

Request:

Provide a copy of the contract with Bechtel.

Response:

Objection. Applicants object to the production of the contract with Bechtel on the grounds that it seeks information which is beyond the scope of Contention No. 8 as admitted by the Board and thus the information contained in any such contract is irrelevant to the issues of this proceeding. Applicants further object on the ground that this Request calls for proprietary and confidential information.

U-8.

Request:

Provide a copy of the procurement procedures manual.

Response:

A copy of the procurement manual will be produced at VEGP at a mutually convenient time.

U-9.

Request:

Provide a list of all contractors and subcontractors engaged by applicants to perform any activities pertaining to the construction of Plant Vogtle ("activities" include QA documentation and audit work as well as physical construction). Include contractors and subcontractors which were previously engaged by the applicants as well as those presently so.

Response:

This document will be produced at VEGP at a mutually convenient time.

U-10.

Request:

Provide a list of all trade unions whose members are involved with Plant Vogtle and, for each union listed, the telephone number and address of the local most directly involved.

Response:

This document will be produced at VEGP at a mutually convenient time.

U-11.

Response:

Copies of all amendments to the PSAR Chapter 17 will be produced at VEGP at a mutually convenient time.

U-12.

Request:

Provide all allegations made by Pullman Power Products quality control personnel concerning construction and the applicants' response(s) thereto.

Response:

Copies of documents which contain allegations made by Pullman Power Products quality control personnel concerning construction and Applicants response thereto will be produced at VEGP at a mutually convenient time.

U-13.

Request:

Provide all allegations concerning Walsh Company and the applicants' response thereto.

Response:

Copies of documents containing allegations concerning Walsh Company, and Applicants' response thereto will be produced at VEGP at a mutually convenient time; except certain personnel records will not be produced because they contain confidential information.

14.

Request:

Provide all Plant Vogtle Quality Concern Forms turned in since the beginning of construction.

Response:

Objection: Applicants object to this Request because it calls for release of confidential information. One of

the assurances made by Applicants to workers at VEGP was that the Quality Concerns forms would remain confidential. Applicants strongly believe that this assured anonymity has protected the integrity of the Quality Concerns Program. Subject to the objection, Applicants will delete from the forms any identifying information and those Quality Concern Forms which are within the scope of Contention No. 8 as admitted by the Board and which involve Contention No. 8 activities will be produced at VEGP at a mutually convenient time.

U-15.

Request:

Provide a list of all forms used to document deviations from design specifications or procedures.

Response:

A copy of the list of all forms used to document deviations from design specifications or procedures will be produced at VEGP at a mutually convenient time.

U-16.

Request:

Provide copies of all audit action requests.

Response:

Copies of all audit action requests which are within the scope of Contention No. 8 as admitted by the Board and which involve Contention No. 8 activities have been included with those documents which are produced in response to Request for Production of Documents Number 2.

U-17.

Request:

Provide all corrected action requests.

Response:

Copies of all corrected action requests (CAR) which are within the scope of Contention No. 8 as admitted by the Board and which involve Contention No. 8 activities will be produced at VEGP at a mutually convenient time.

U-18.

Request:

Provide all information relating to the "inadequate core cooling system" as discussed at the meetings June 12 and June 27, 1984.

Response:

Applicants object to producing the documents requested in this paragraph because none of the information contained in the documents requested would be within the scope of Contention No. 8 as admitted by the Board. It is therefore irrelevant to these proceedings and not calculated to lead to the discovery of admissible evidence.

U-19.

Request:

Provide all information relating to the meeting of August 22, 1983 concerning subcontractor Quality Assurance.

Response:

Objection. Applicants object to this Request on the grounds that it is overly broad and vague and calls for

information beyond the scope of Contention No. 8 as admitted by the Board. Subject to this objection; Applicants stat that some of the documents requested in paragraph 19 are included within those documents which will be produced in response to Request for Production of Documents, paragraph 12, above.

U-20.

Request:

Provide any statements or agreements which applicant or its contractors/subcontractors may require workers to sign or otherwise comply with which restrict or regulate in any way the employees' talking to or being involved with the NRC, NRC staff, news media, intervenors, public interest groups, or any other person or entity concerning the construction of Plant Vogtle.

Response:

Objection. Applicants object to producing the documents requested in this paragraph because none of the information which would be contained in such documents would be within the scope of Contention No. 8, as admitted by the Board. Subject to this objection, Applicants state that there are no such documents.

U-21.

Request:

Provide copies of all non-conformance reports, deviation analysis reports, action requests, corrective action

requests, audit action requests, field variance authorizations, deficiency reports, field questions, stop work notifications, stop work releases, field disposition instructions, field deviation disposition requests, Plant Vogtle construction work authorizations, conditional releases, and audit reports generated at Plant Vogtle from the inception of construction to the present.

Response:

Applicants maintain no documents known as "deviation analysis reports", "action requests", "field variance authorizations", "field questions", "field disposition instructions", "field deviation disposition requests."

Applicants maintain a document known as a construction work request which is presumed to be referred to by intervenors as a "Plant Vogtle construction work authorization." Those documents, and all non-conformance reports, conditional releases, and deficiency reports which are within the scope of Contention No. 8 as admitted by the Board and which involve Contention No. 8 activities will be produced at VEGP at a mutually convenient time.

Corrective action requests will be produced in response to Request No. 17, above.

Stop work notifications (which include stop work releases) will be produced in response to Request No. 4 above.

Audit Reports (which include audit action requests) will be produced in Response to Request No. 2, above.

U-22.

Request:

Provide any trend analyses performed at Plant Vogtle.

Response:

All such documents insofar as they are within the scope of Contention No. 8 as admitted by the Board and insofar as they involve Contention No. 8 activities will be produced at VEGP at a mutually convenient time.

U-23.

Request:

Provide the master deficiency list.

Response:

A copy of this document will be produced at VEGP at a mutually convenient time.

U-24.

Request:

Provide any engineering change notices generated at Plant Vogtle for any reason following the discovery that equipment could not meet the original specifications.

Response:

As described in response to Interrogatory No. 13, above, Applicants do not have a specific document which is known as an engineering change notice. Any "engineering change notice" (as that word may be used by the Interveners) which document would have been generated at VEGP following the discovery that equipment could not meet the

original specifications would be included within the deviation reports which have been already produced to the Intervenor in response to Request No. 21, above.

U-25.

Request:

Provide all documents relating to core drilling into rebars at Plant Vogtle.

Response:

Objection. This request for production of documents is beyond the scope of Contention No. 8 as admitted by the Board. It is therefore irrelevant to these proceedings and not calculated to lead to the discovery of admissible evidence. Any core drilling into rebars at Plant Vogtle would not have been for the purpose of documenting the placement of concrete, for testing the concrete or for the preparation of correct concrete quality test records or done in connection with any welding procedure.

U-26.

Request:

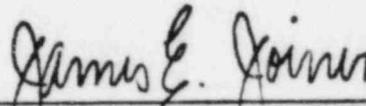
Provide all documents relating to storage of equipment on-site, including but not limited to storage of electrical cabinets.

Response:

Objection. Applicants object to this request for production of documents in that it is burdensome and oppressive. To the extent the Intervenor seeks to review

documents generated by QC/QA in connection with the non-conformance of the storage procedures with regard to the storage of a particular piece of equipment on-site, those documents will be produced in response to Request for Production of Documents No. 21, above. Any further information requested would be irrelevant and beyond the scope of 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 \_\_, 1985

January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

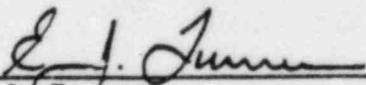
Before the Atomic Safety and Licensing Board

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

AFFIDAVIT

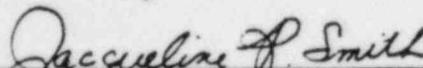
I, E. J. Turner, being duly sworn, hereby state that I am employed by Georgia Power Company as Project Procurement Manager.

The information reflected in the interrogatory responses contained in the Applicants' Response to Intervenors' Second Set of Interrogatories and Request for Production of Documents No.2 and 14, is true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
E. J. Turner

Sworn to and subscribed before me this

~~10th~~ day of January, 1985.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: April 11, 1988

January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

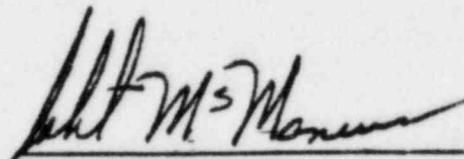
Before the Atomic Safety and Licensing Board

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

AFFIDAVIT

I, Robert McManus, being duly sworn, hereby state that I am employed by Georgia Power Company as Assistant Project Construction Manager II.

The information reflected in the interrogatory responses contained in the Applicants' Response to Intervenors' Second Set of Interrogatories and Request for Production of Document No. 26, is true and correct to the best of my knowledge, information, and belief.

  
Robert McManus

Sworn to and subscribed before me this

10<sup>th</sup> day of January, 1985.

Bette A. Drake  
NOTARY PUBLIC

My Commission Expires: Jan 20, 1989



January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

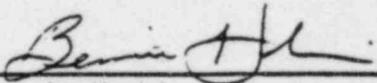
Before the Atomic Safety and Licensing Board

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

AFFIDAVIT

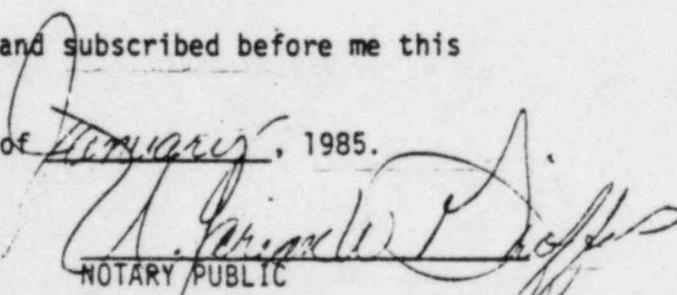
I, Bennie Harbin, being duly sworn, hereby state that I am employed by Georgia Power Company as Manager of Quality Control.

The information reflected in the interrogatory responses contained in the Applicants' Response to Intervenors' Second Set of Interrogatories and Request for Production of Documents No. 10, 13, 15, 18, 19 and 23, is true and correct to the best of my knowledge, information, and belief.

  
Bennie Harbin

Sworn to and subscribed before me this

10 day of January, 1985.

  
NOTARY PUBLIC

My Commission Expires: NOTARY PUBLIC, GEORGIA STATE AT LARGE  
MY COMMISSION EXPIRES JUNE 14, 1988

January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

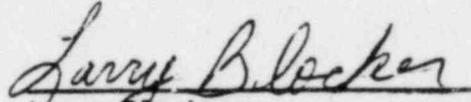
Before the Atomic Safety and Licensing Board

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

AFFIDAVIT

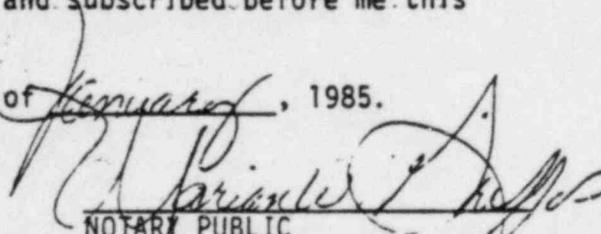
I, Larry Blocker, being duly sworn, hereby state that I am employed by Georgia Power Company as Assistant Manager, Quality Control.

The information reflected in the interrogatory responses contained in the Applicants' Response to Intervenors' Second Set of Interrogatories and Request for Production of Document No. 24, is true and correct to the best of my knowledge, information, and belief.

  
Larry Blocker

Sworn to and subscribed before me this

10 day of January, 1985.

  
NOTARY PUBLIC

My Commission Expires:

NOTARY PUBLIC, GEORGIA STATE AT LARGE  
MY COMMISSION EXPIRES JUNE 14, 1988

January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

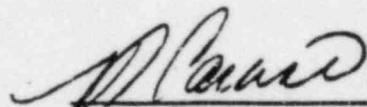
Before the Atomic Safety and Licensing Board

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

AFFIDAVIT

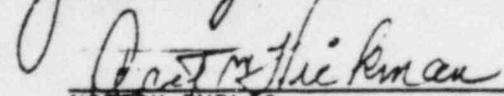
I, Keith Caruso, being duly sworn, hereby state that I am employed by Bechtel Power Corporation as M&QS Coordinator.

The information reflected in the interrogatory responses contained in the Applicants' Response to Intervenors' Second Set of Interrogatories and Request for Production of Document No. 27, is true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Keith Caruso

Sworn to and subscribed before me this

10<sup>th</sup> day of January, 1985.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 10/24/88

January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the matter of	:	
GEORGIA POWER COMPANY, <u>et al</u>	:	Docket Nos. 50-424
	:	50-425
(Vogtle Electric Generating	:	
Plant, Units 1 and 2)	:	

AFFIDAVIT

I, Charles Hayes, being duly sworn, hereby state that I am employed by Georgia Power Company as Vogtle Quality Assurance Manager.

The information reflected in the interrogatory responses contained in the Applicants' Response to Intervenors' Second Set of Interrogatories and Request for Production of Documents No. 3, 6 and 16, is true and correct to the best of my knowledge, information, and belief.

Charles W Hayes  
Charles Hayes

Sworn to and subscribed before me this

11th day of January, 1985.

Jacqueline R. Smith  
NOTARY PUBLIC

My Commission Expires: 4/11/88

January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

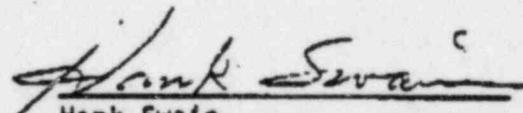
Before the Atomic Safety and Licensing Board

In the matter of	:	
GEORGIA POWER COMPANY, <u>et al</u>	:	Docket Nos. 50-424
	:	50-425
(Vogtle Electric Generating	:	
Plant, Units 1 and 2)	:	

AFFIDAVIT

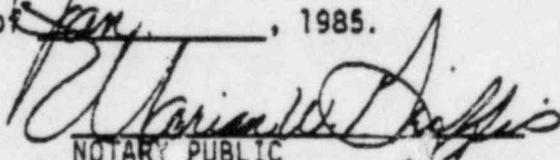
I, Hank Swain, being duly sworn, hereby state that I am employed by Georgia Power Company as Section Supervisor, Quality Control.

The information reflected in the interrogatory responses contained in the Applicants' Response to Intervenors' Second Set of Interrogatories and Request for Production of Document No. 22, is true and correct to the best of my knowledge, information, and belief.

  
 \_\_\_\_\_  
 Hank Swain

Sworn to and subscribed before me this

11 day of Jan, 1985.

  
 \_\_\_\_\_  
 NOTARY PUBLIC

My Commission Expires \_\_\_\_\_

January 11, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

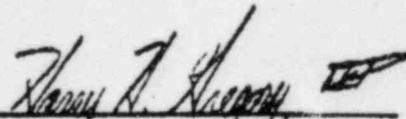
Before the Atomic Safety and Licensing Board

In the matter of	:	
GEORGIA POWER COMPANY, <u>et al</u>	:	Docket Nos. 50-424
(Vogtle Electric Generating	:	50-425
Plant, Units 1 and 2)	:	

AFFIDAVIT

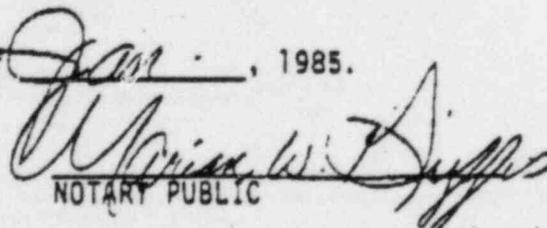
I, Harry H. Gregory, III, being duly sworn, hereby state that I am employed by Georgia Power Company as General Manager, Nuclear Construction.

The information reflected in the interrogatory responses contained in the Applicants' Response to Intervenors' Second Set of Interrogatories and Request for Production of Documents No. 8, 9, 13 and 17, is true and correct to the best of my knowledge, information, and belief.

  
 \_\_\_\_\_  
 Harry H. Gregory, III

Sworn to and subscribed before me this

11 day of Jan, 1985.

  
 \_\_\_\_\_  
 NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

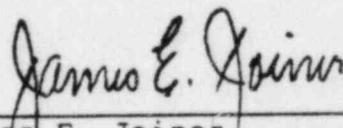
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Response to Intervenors Second Set of Interrogatories and Request for Production of Documents," dated January 11, 1985, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, or where indicated by an asterisk (\*) by hand delivery, this 11<sup>th</sup> day of January, 1985.

  
\_\_\_\_\_  
James E. Joiner

Dated: January 11, 1985.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

SERVICE LIST

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

Mr. Gustave A. Linenberger  
Atomic Safety and Licensing Board  
U.S.Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Oscar H. Paris  
Atomic Safety and Licensing Board  
U.S.Nuclear Regulatory Commission  
Washington, D.C. 20555

Bernard M. Bordenick, Esq.  
Office of Executive Legal Director  
U.S.Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
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

\*Douglas C. Teper  
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Atlanta, GA 30306

Jeanne Shorthouse  
507 Atlanta Avenue  
Atlanta, GA 30315

\*Laurie Fowler &  
Vicki Breman  
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Assistance Foundation  
1102 Healy Building  
Atlanta, GA 30303

\*Tim Johnson  
Campaign for a  
Prosperous Georgia  
175 Trinity Avenue, S.W.  
Atlanta, GA 30303

Carol A. Stangler  
425 Euclid Terrace  
Atlanta, GA 30307