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## FELATED CORRESPONDENCE

May 13, S1994

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges: Peter B. Bloch, Chair Dr. James H. Carpenter Thomas D. Murphy '94 MAY 16 P3:22

OFFICE OF SECRETARY DOCKETING & SERVICE BRANCH

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In the Matter of

GEORGIA POWER COMPANY et al.,

(Vogtle Electric Generating Plant, Unit 1 and Unit 2) Docket Nos. 50-424-0LA-3 50-425-0LA-3

Re: License Amendment (transfer to Southern Nuclear)

ASLBP No. 93-671-01-0LA-3

## INTERVENOR'S FIRST TENTATIVE WITNESS LIST CONCERNING CHARACTER AND COMPETENCE

Intervenor submits his preliminary list of witnesses concerning character and competence (subject to amendment at a later date):

- 1. Ed Addison
- 2. John Aufdenkampe
- 3. Barney Beasley
- 4. George Bockhold
- 5. Mark Briney
- 6. Kenneth Burr
- 7. James Bailey
- 8. Paul Burwinkle
- 9. Jimmy Paul Cash
- 10. Charles Coursey
- 11. Bill Chenault
- 12. A.W. Dahlberg
- 13. S. Driver

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- 14. Christopher Eckert
- 15. Georgie Fredrick
- 16. Joseph Farley

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- 17. Thomas Greene
- 18. George Hairston
- 19. H.M. Handfinger
- 20. K.R. Holmes
- 21. M.W. Horton
- 22. W.F. Kitchens
- 23. Paul Kochery
- 24. R.L. LeGrand
- 25. Harry Majors
- 26. Ken McCoy
- 27. Patrick McDonald
- 28. Cliff Miller
- 29. Allen Mosbaugh
- 30. Rick Odom
- 31. Paul Rushton
- 32. Jackson Stringfellow
- 33. William Shipman
- 34. Kenneth Stokes
- 35. Jay Schaudies
- 36. Robert Sherrer
- 37. J.E. Swartzwelder
- 38. C.P. Stinespring
- 39. T.E. Webb

- 40. Louis Ward
- 41. Guss Williams
- 42. All GPC Board of Directors (including ex officio and honorary board members between 1987-1994)
- 43. All Southern Company Board of Directors (including ex officio and honorary board members between 1987-1994)
- 44. All GPC Management Council members
- 45. All persons necessary to authenticate and introduce pre-filed documents
- 46. Rebuttal witnesses as necessary
- 47. NRC Resident inspectors stationed at Plant Vogtle between 1987 and 1992
- 48. All individuals identified in the exhibits attached to Licensee's proposed stipulations
- 49. Expert witnesses (Intervenor is currently researching and attempting to identify expert witnesses relevant to this proceeding. Once they are identified, the other parties shall be informed of their identity)
- 50. All witnesses identified in "phase I" proceeding related to character, competence, integrity and credibility of Licensee and its witnesses.

With respect to NRC Staff, Intervenor may call the following witnesses:

- 1. Ken Brockman
- 2. Al Chafee
- 3. Stewart Ebneter
- 4. Ben Hayes
- 5. Larry Robinson
- 6. All members of the "Vogtle Coordinating Group"
- 7. All individuals who participated in any investigation of Plant Vogtle between 1988 and present;

8. All resident inspectors stationed at Plant vogtieJED Plant Hatch and Plant Farley.

Respectfully submitted MAY 16 P3:22

Michael D. Kohn OFFICE OF SECRETARY Kohn, Kohn & Colapinto, PINO & SERVICE 517 Florida Ave., N.W. BRANCH 517 Florida Ave., N.W. Washington, D.C. 20001 (202) 234-4663

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## CERTIFICATE OF SERVICE

I hereby certify that on May 13, 1994 Intervenor filed his Witness List Concerning Phase II by first class mail upon the following (additional service by facsimile designated by "\*"):

\*Administrative Judge Peter B. Bloch, Chair Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

\*Administrative Judge James H. Carpenter 933 Green Point Drive Oyster Point Sunset Beach, NC 28468

\*Administrative Judge Thomas D. Murphy Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

\*Charles A. Barth, Esq. Office of General Counsel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

\*John Lamberski, Esq. Troutman Sanders Suite 5200 600 Peachtree Street, N.E. Atlanta, GA 30308-2216

(continued on next page)

\*Ernest L. Blake, Jr. David R. Lewis SHAW, PITTMAN, POTTS & TROWBRIDGE 2300 N Street, N.W. Washington, D.C. 20037

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

Office of Commission Appellate Adjudication U.S. Nuclear Regulatory Commission Washington, D.C. 20555

By:

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