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**Southern Nuclear Operating Company**  
**Information on Site Modifications Prior to Limited Work Authorization**  
**Issuance for New Units at Vogtle Electric Generating Plant**

Ladies and Gentlemen:

As we have previously advised you, Southern Nuclear Operating Company (SNC), as agent for Georgia Power Company, is in the process of preparing both an application for an Early Site Permit (ESP) for two new units at Vogtle Electric Generating Plant (VEGP) site, for submission in August 2006, as well as an application for a Combined Operating License for the new units, to be submitted not later than the first half of 2008. Although no decision to construct new Units 3 and 4 on the VEGP site has been made, SNC has identified several modifications to Unit 1 and 2 structures and components that are located on or adjacent to the proposed site of Units 3 and 4 that are needed prior to the date construction of the new units would begin, if they were to be constructed. These modifications have been the subject of recent discussions with the NRC staff with regards to the applicability of the ESP limited work authorization (LWA) process, specifically whether they constitute non-safety related construction activities covered by LWA-1 and that are described in 10 CFR 50.10(e)(1). In addition to these modifications, several routine modifications in support of Units 1 and 2 are planned for the next few years that could be viewed as providing some benefit for potential construction of the proposed new units at VEGP. To facilitate discussion with the staff, SNC is providing a list of these construction activities and modifications in the Enclosure. Please note that this list is provided for discussion purposes only and is subject to change as planning activities continue.

The activities discussed in Enclosure 1 will be performed in accordance with the existing Part 50 licenses for Units 1 and 2 and SNC believes that they are outside the scope of LWA-1 and 50.10(e)(1) as those provisions relate to the proposed Units 3 and 4. All of these activities will be performed with appropriate reviews against the site environmental plan for the existing units, and in most cases the environmental impact can be considered de minimus. These activities are associated with systems, structures and components (SSCs) associated with Units 1 and 2. Thus, although 10 CFR 50.10(e)(1) addresses the construction of new facilities, SNC believes that these activities are not within the scope of that regulation, regardless of the motivation for performing the work.

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We look forward to further discussion of these activities with NRC staff. Southern Nuclear is working diligently to ensure that our site construction activities are well planned and coordinated to minimize impacts to the existing units, to support efficient construction of the new units, and to fully meet all regulatory requirements.

If you have any questions please contact Mr. Charles Pierce at 205-992-7872.

Sincerely,



J. A. (Buzz) Miller

Enclosure

cc: Southern Nuclear Operating Company  
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Nuclear Regulatory Commission

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## Enclosure

### VEGP Site Facility Modifications With Potential Benefit for New Unit Construction

The activities listed below are activities at the VEGP site that are associated with Unit 1 & 2 facilities, may be scheduled prior to receipt of a Limited Work Authorization (LWA) for new units, and may be viewed as providing some incidental benefit for new unit construction. SNC considers these activities to be outside the scope of the LWA activities as defined in 10 CFR 50.10(e).

This is a preliminary list for planning purposes; the items on this list will change and other items may be identified as more detailed planning is completed.

#### 1. Reroute MacIntosh transmission line

This transmission line supporting Units 1 and 2 crosses the proposed excavation area for Units 3 and 4. The line must be rerouted to maintain operation of Units 1 and 2 during excavation of Units 3 and 4 footprint. Currently, the planned reroute is totally within the existing site. The concept would be to build the new line, make connections to existing Unit 1 and 2 switchyard, and remove abandoned towers from Unit 3/4 site after new lines are in place. In order to support Units 3 and 4, the line may be modified again to tie into the new switchyard after the switchyard is constructed.

SNC believes that because this is a Unit 1 and 2 system, structure or component (SSC), the prudent control of this modification is within the existing design modification process for Units 1 and 2. This process includes a review of the environmental impacts under the existing site environmental protection plan, and also includes the safety evaluations appropriate for the operating units.

#### 2. Raise Scherer, Goshen, SCE&G and Augusta Newsprint transmission lines over proposed haul route.

Existing towers for these transmission lines would be raised if detailed design work for the AP1000 units and the proposed haul route determine that additional clearance is needed. Work needs to be coordinated with Unit 1 and 2 outages. The environmental impact of this modification will be de minimus. As with the previous item, SNC views the existing design modification process for Units 1 and 2 as adequate and appropriate for these planned activities.

#### 3. Build new contractor in-processing facility

The existing Admin Support Building is currently used for outage contractor in-processing. This is an aging construction building that needs major upgrades and maintenance to remain usable. SNC is planning to replace the facility with a smaller building specifically for contractor in-processing. The existing facility is not directly in the new plant footprint, but is close enough that demolition could provide some benefit for new plant construction. The new facility will be located outside the impact of the new unit construction area.

4. Relocate used oil storage facility

The used oil storage facility is a small tank with associated concrete pad, berm wall and piping for transferring used oil. The existing facility is located directly in footprint of the new units and would need to be relocated. This is a small facility and the environmental impact will be de minimus.

5. Relocate turbine rotor storage building

Existing rotor storage building is located on rail spur within impact area of new unit excavation. The existing facility is located in the footprint. Plans under consideration are to build a new rail spur and relocate the storage building.

6. Demolish "Nisco" construction building

This shop building is no longer used. It is a sheet metal building that is no longer maintained and would need significant upgrades and maintenance to become usable. This building should be demolished regardless of the construction of new units and would not be replaced.

7. Replace DAW storage building

The dry active waste (DAW) storage building is currently used to store equipment for Unit 1 and 2 outages, and is located within the footprint of the new cooling towers. This building marginally meets the needs of Unit 1 and 2. Replacement of this building with a new facility inside the existing protected area is being discussed as long term site improvement for Unit 1 and 2, regardless of construction of additional units. It is proposed that a new facility will be sized to support Units 1 and 2 with room for expansion for Units 3 and 4.

8. Fire training facility modifications

The current fire training facility is located in the planned laydown area for the new units. This facility could remain functional during construction of the new units, but the fire header that supplies the facility will be affected by the new unit excavation. Options being considered are to provide a new source of fire water to the facility or to relocate the entire facility. Modifications to or relocation of this facility must be complete before excavation affects the fire header because this facility is used continuously to maintain fire brigade qualifications for Units 1 and 2.

9. Install new well pump

Existing Well Pump Number 2 has water quality issues and is only used as a last resort for well water. SNC wants to replace this well with a new well, regardless of the construction of Units 3 and 4. This well is currently located in the proposed new switchyard. The new well will continue to support Units 1 and 2 but will be located in an area unaffected by the new construction.

10. Replace electrical storage building

This building is an aging shop building from initial plant construction. It is currently used as an insulation shop for outage support and storage of some equipment. This building is within the footprint of the new units. Vogtle is considering adding a facility within the Protected

Area for continued outage support for Units 1 and 2 regardless of the construction of Units 3 and 4.

**11. Demolish construction warehouse**

The large construction warehouse built in support of Units 1 and 2 construction is located partially within the footprint of the new units. The major sections of this warehouse have been abandoned, with the far north section still being used to store a small quantity of large items. The building is an aging sheet metal facility. SNC has no plans to upgrade the facility for future use for Units 1 and 2. Vogtle is considering making other arrangements for storage of these materials and demolishing this facility without replacement. One section of this warehouse was demolished several years ago for reasons unrelated to the addition of new units.