



# Southern Alliance for Clean Energy

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RE: Environmental Scoping Comments from Southern Alliance for Clean Energy on the Southern Nuclear Operating Company Early Site Permit Application for nuclear Plant Vogtle

December 4, 2006

Southern Alliance for Clean Energy (SACE) is a nonprofit, nonpartisan organization that promotes responsible energy choices that solve global warming problems and ensure clean, safe and healthy communities in the Southeast. SACE has staffed offices in Atlanta and Savannah, and elsewhere in the region, and members throughout Georgia and the Southeast who are concerned about energy and the environment.

We are extremely concerned about the proposed expansion of nuclear plant Vogtle as outlined in the early site permit (ESP) application submitted by Southern Nuclear Operating Company (SNC). The issue of building more nuclear reactors at Plant Vogtle will affect not just the local Waynesboro community, but Georgia as a whole and our region overall. Energy practices need to be implemented and decisions need to be made that will benefit all Georgians, those here today and those of future generations, not just a select few. Building more nuclear reactors will increase safety and security threats, pose further risks to public health and the environment, exacerbate the nuclear waste dilemma, undermine nuclear non-proliferation efforts, and take away limited financial resources from more effective energy technologies that can better mitigate the effects of global warming.

We urge the Nuclear Regulatory Commission (NRC) staff to develop a comprehensive, and up-to-date draft Environmental Impact Statement (EIS) for the Vogtle early site permit that steps back and looks at the multiple effects that building two more nuclear reactors at Plant Vogtle will have on Georgia's communities, economy, and environment.

### Energy Efficiency & Conservation; Need for Power

Energy efficiency and conservation represent the quickest, safest, cheapest way to provide more power and to best protect our air and water resources while mitigating the energy sector's contributions to global warming. The NRC should be aware that in 2001, the Energy Information Administration ranked Georgia 8<sup>th</sup> in the nation for per capita energy consumption

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for electricity and 40<sup>th</sup> in per capita spending on energy efficiency programs. The NRC needs to evaluate both Georgia's actual need for power and how conservation and efficiency could reduce this demand. (See *Powering the South*, REPP, 2002, [www.poweringthesouth.org](http://www.poweringthesouth.org)). The NRC should evaluate what the impacts would be if the same amount of money estimated to build up to two new reactors at Vogtle were instead spent on energy efficiency and conservation measures. For instance, how many high compact fluorescent light bulbs could be purchased and installed in Georgia for ~\$2-4 billion and how would that reduce our total energy demand? The NRC should also study the benefits that energy efficiency and conservation provide to our water resources, in comparison to nuclear power, which is highly water intensive. For some basic information, please see our report for the 2005 Georgia Water Resources Conference, *Water Conservation Opportunities Through Energy Efficiency in Georgia*, downloadable at <http://www.cleanenergy.org/resources/pubs.cfm>.

Georgia is currently an energy exporting state. We question whether expanding Plant Vogtle is actually needed. For instance, Georgia Power has recently proposed to shut down its existing 540 MW coal-fired McDonough power plant near Smyrna north of Atlanta and replace it with three-800MW combined cycle natural gas units to be completed in 2010-2012 (*Planned electric plant is cleaner*, Atlanta Journal Constitution, 11/29/06, <http://www.ajc.com/search/content/business/stories/2006/11/29/1129bizplant.html>). The NRC needs to evaluate Southern Company's subsidiaries' future growth plans, such as Georgia Power, to better determine whether two new nuclear reactors at Plant Vogtle are even needed. The 2007 Integrated Resource Plan (IRP) is a long-term energy planning process that is required for regulated utilities to undergo every three years by the Georgia Public Service Commission (PSC). The PSC will receive Georgia Power's plan in January 2007. The NRC should track the IRP process in order to glean necessary information (visit the PSC's website at <http://www.psc.state.ga.us>).

The NRC should also be aware that the State of Georgia is undergoing the development of its first energy strategy, overseen by the Georgia Environmental Facilities Authority (GEFA). A wealth of information on various energy issues specific to Georgia can be found at [www.georgiaenergyplan.org](http://www.georgiaenergyplan.org).

### Evaluation of Renewable Energy Supplies

The NRC needs to fully research safe, clean renewable energy resources in Georgia, such as biopower, solar, and wind. Chapter 9 of SNC's early site permit (ESP) application is disappointing at best. Additionally, Chapter 9 completely disregards the effectiveness that a diverse portfolio of energy efficiency and renewable energy options can provide for citizens of Georgia. The NRC needs to study these combined potentials.

#### *Wind Energy*

Chapter 9 of the SNC ESP application did a remarkable job of outlining all the supposed negatives associated with wind energy while overlooking nearly all the benefits. For instance, it mentions how many acres are needed for wind development and came to the conclusion that "the wind alternative would require a large green field site, which would result in a LARGE environmental impact." One of the biggest national supporters of wind power is the American

Corn Growers Association because farmers can both lease out land for wind production and work their crops. Unlike nuclear power, wind turbines are safe and do not need to be isolated. For more information, see [http://www.acga.org/renewable\\_energy/default.htm](http://www.acga.org/renewable_energy/default.htm). In the Southeast, the Buffalo Mountain Wind Farm in Eastern Tennessee helped turn an old reclaimed strip mine into a local attraction that integrates multiple uses and generates important tax base for the local rural county. Off shore wind farms have shown to be beneficial to local fish populations due to the forming of artificial reefs – providing a special benefit to sports fishing. There is substantial wind potential off Georgia's coast that if developed could meet new power demands. The technology of off shore wind has been successfully deployed in Europe and could provide a great opportunity for Georgia.

The NRC should be aware that the National Renewable Energy Laboratory recently released new wind maps of Georgia. Much of SNC's very brief review of wind energy is out of date and would now be considered inaccurate. The Georgia Wind Map was prepared by AWS Truewind, and was funded by the Georgia Environmental Facilities Authority (GEFA) and the National Renewable Energy Laboratory in conjunction with activities of the Georgia Wind Working Group (of which SACE and Southern Company, among many others, are members). The map and associated databases provide information important to the preliminary evaluation of prospective wind energy sites and the estimation of wind turbine performance. The available wind statistics onshore include monthly and seasonal average wind speed at 50 m above effective ground level, as well as annual average wind speed and power density at 30, 70, and 90 m. Offshore, the available statistics include average annual wind speed at 10, 30, 50, 90, 150, and 300 m as well as power density at 50 and 90 m and an estimated capacity factor at 90 m. The wind resource map highlights the offshore and land-based wind resource potential and shows that while the large majority of Georgia has wind speeds too low for development with current technologies, an attractive development opportunity exists in North Georgia as well as offshore. According to Bruce Bailey from AWS Truewind's Power Point presentation from the Georgia Wind Energy Conference held on October 24, 2006 in Atlanta, Class 3 and above wind speeds in Georgia could provide up to 4700 MW of wind energy potential while offshore Class 4 wind speeds and above could provide over 10,000 MW of wind energy potential (see Slide 13 of Bruce Bailey's presentation at <http://www.gawwg.org/agenda.html>). Please see <http://www.gawwg.org/windresources/georgiawindresourcemap.html> for a complete description along with instructions on how to download the new wind maps.

### *Bioenergy*

The potential to use Georgia's plentiful agriculture and forestry resources must be more thoroughly evaluated by the NRC. The SNC application was very limited in its discussion or research on opportunities for biopower in Georgia and failed to acknowledge the contribution biomass-based energy production can provide in terms of mitigating the effects of global warming, especially in comparison to other forms of fossil-fuel electricity generation. Georgia has the greatest biomass generation potential in the South when compared to other forms of renewable energy or when compared to biomass potential in other states in the South (see *Powering the South*, REPP, 2002, [www.poweringthesouth.org](http://www.poweringthesouth.org)). The ESP application failed to mention that Georgia's abundant existing crop and forestry residues can be used for energy production, not just 'new' energy crops such as switchgrass. A conservative estimate from a University of Georgia study showed that as much as 12% of Georgia's total electricity demand

could be generated from biomass (*The Economic Feasibility of Generating Electricity from Biomass Fuel Sources*, 2003, available at <http://www.agecon.uga.edu/~caed/Feasibility%20Study603.pdf>).

New biopower projects are being pursued in Georgia. Earth Resources Inc. is developing a 20MW poultry litter gasification facility in Carnesville, GA just 70 miles to the northeast of Atlanta. Green Power EMC has entered into a 15-year agreement to purchase the electricity produced at the facility beginning in 2007. (See <http://www.greenpoweremc.org/article.aspx?categID=4&articleID=699> and <http://atlanta.bizjournals.com/atlanta/stories/2006/03/20/daily15.html>.) The NRC should study these biopower projects as an alternative to building more nuclear reactors at Vogtle. Small, distributed energy production facilities such as this poultry litter to energy facility can provide significant benefits to Georgia's economy, agricultural sector, energy security and the environment. For more details on some of these benefits, please see our report for the 2005 Georgia Water Resources Conference, *Water Quality Implications of Bio-Fuels Development in Georgia*, downloadable at <http://www.cleanenergy.org/resources/pubs.cfm>.

### *Solar*

Chapter 9 of the SNC application does not properly evaluate the potential solar technologies can provide in Georgia. In a report by Navigant Consulting titled *PV Grid Connected Market Potential under a Cost Breakthrough Scenario* in September 2004, Georgia was listed as the fifth most attractive state for solar photovoltaic (PV) market potential in the nation. There are a number of benefits that could result from offsetting a larger portion of Georgia's current fossil and nuclear fuel central-station power generation with clean, distributed, solar PV. The PV systems would have positive environmental, economic, and public health benefits for several reasons: PV systems do not use the water that traditional electric generating units use; there are no emissions of NO<sub>x</sub>, SO<sub>x</sub>, HC, CO<sub>2</sub>, heavy metals, and radioactive contaminants; or generation of long-lived nuclear waste. A benefit of solar energy is that the energy produced can be used right at the point of generation. Additionally, solar energy offers a great benefit in the southeast as it can produce power on hot sunny days when the utilities need electricity the most, often when utilities have to buy off grid for power at over 15 cents a kWh, making solar cost effective. We strongly object to the ESP application's statement that, "solar energy offers a distinct environmental disadvantage, relative to nuclear energy due to its LARGE land use impacts." Anyone familiar with solar technology knows that all large scale solar is going up on flat roofs. Large manufacturers from Coca Cola to Fed Ex are doing this to meet their energy demands. For more information, see <http://www.solarintegrated.com/>.

The SNC application compared a nuclear power plant with large scale, centralized solar to meet actual power demand. The proper comparison should have looked at the use of the same amount of money not to build a large-scale solar power plant, but to incentivize solar installations on commercial and residential rooftops. Then it should be compared not to the amount of MW that it produces but to solar energy's ability to meet power demands with its production during peak demand times when utilities actually need the power. The NRC should evaluate, for example, how much solar thermal generation for solar hot water heating or how much solar PV could be installed in Georgia for the estimated cost of building two new reactors at Plant Vogtle. Solar energy can compare favorably to nuclear for cost for meeting actual

power demand. For more information, please see <http://media.pennnet.com/documents/Solar+data.pdf>.

### Water Impacts

Power plants have a tremendous impact on our water resources. Our future energy choices will make a substantial difference on the future of the river basins and the communities and businesses reliant on those water sources. Given that the early site permit is valid for 20 years with a possible 20-year extension, we believe the NRC needs to evaluate not only the Georgia of today but the Georgia we may be living in 20 to 40 years from now, and certainly the Savannah River basin of today and 20 years from now. Georgia is anticipated to experience tremendous population growth over the next decades that will not only place increased demand on the electricity sector, but also upon existing water supplies, which are already being 'fought' over by a variety of public and private interests.

### *Water Use & Supply*

Because of the high water needs of most traditional fossil fuel and nuclear power plants in comparison to renewable energy supplies such as wind and solar, promoting more of the status quo may be ill-advised for a state such as Georgia that will need to provide water supplies to businesses, municipalities, industry, and others. Consideration should be given to current and future energy production in terms of limited water availability (e.g. in times of drought). Most power production in Georgia relies on continuously and readily available water supplies. If that trend continues, and coincides with drought conditions, Georgia could be left in a vulnerable position.

As the NRC may be aware, Plant Vogtle currently has larger water permits than many Georgia municipalities, including nearby Augusta. According to the Georgia Environmental Protection Division (EPD), in 2001 Plant Vogtle had an average withdrawal of 64 million gallons per day (mgd) from the Savannah River and an average water consumption of 43 mgd. Vogtle is returning only about one-third of what it withdraws from the Savannah River, a river that is already highly utilized. The plant is actually permitted for a daily maximum withdrawal of 127 mgd, which is nearly double that of both of the City of Augusta/Richmond County's permits to pull from the Savannah River and Augusta Canal (daily maximum is 71 mgd with a monthly average withdrawal of 60 mgd). Building up to two new reactors will have an incredible impact on the Savannah River and the future growth of the region in terms of available water supply. More and more municipalities are looking to the Savannah River as a supply source for drinking water. The NRC needs to evaluate the current and projected water supply needs of the Savannah River basin, and during drought conditions, and assess the far-ranging social, economical and environmental implications of Plant Vogtle's expansion on this water resource.

### *Water Quality*

In terms of water quality, tritium, a radioactive form of hydrogen that can negatively impact our health, especially that of a developing fetus, is of particular concern in the Savannah River basin. Faced with saltwater intrusion of the Floridian Aquifer, both Beaufort and Jasper counties in South Carolina and the Savannah area will become more dependent on the Savannah River for drinking water. Plant Vogtle already contributes to the tritium in the river and building more reactors will increase these levels. Elevated levels of tritium have been found in the Savannah

River and in groundwater in Burke County, GA. Among other reports, see Georgia EPD's Environmental Radiation Surveillance Report 2000-2002, available at [http://www.state.ga.us/dnr/environ/gaenviron\\_files/radiation\\_files/radrpt2002.htm](http://www.state.ga.us/dnr/environ/gaenviron_files/radiation_files/radrpt2002.htm).

The NRC needs to study the impacts of tritium in the Savannah River, including future projections, especially given the Department of Energy's Savannah River Site's (SRS) already large contribution to tritium pollution and its plans to expand. The NRC should analyze the impact of tritium with droughts and future population growth in mind.

The NRC should also study the assimilative capacity of the Savannah River, which has become an increasingly important issue for both Georgia and South Carolina in terms of the future use and health of the Savannah River basin. Demands for additional assimilative capacity are expected as population and employment growth continue, which may therefore require that more aggressive steps will be needed to reduce the amount of water withdrawn and to more thoroughly treat the water being discharged back to the river. The NRC should also study the dissolved oxygen (DO) levels throughout the Savannah River basin, especially the already grave DO situation in the lower Savannah, downstream of Plant Vogtle. A final, revised total maximum daily load (TMDL) for DO in the lower Savannah was just issued by the EPA in November 2006 and the NRC needs to conduct its evaluation using this new standard.

#### Global Warming

Nuclear power is not a viable solution to global warming. Existing and proposed nuclear reactor designs pose fundamental concerns including high costs, security vulnerabilities, and how to manage the highly toxic, long-lived radioactive waste. New nuclear power plants are expected to be very expensive, requiring billions of dollars in U.S. taxpayer subsidies as outlined in the Energy Policy Act of 2005. If they are even built, they are not expected to be online before 2015 as nuclear power plants require much longer lead times than other technologies, resulting in a marked delay in contributing to reducing carbon dioxide emissions. Next-generation reactors are even further from becoming a reality. In order to make a significant contribution to the reduction of carbon dioxide emissions globally, thousands of nuclear power plants would need to be built under unrealistic timeframes constrained even further by limited financial resources. To put this in perspective, currently just over 400 nuclear power plants operate worldwide.

The NRC needs to study how global warming pollution, specifically CO<sub>2</sub>, could be reduced if the same money spent on expanding Plant Vogtle were instead used by other technologies, such as energy efficiency and conservation and renewable energy supplies including wind, solar, and biopower.

The NRC needs to evaluate predicted effects of global warming on this region, specifically on the Savannah River basin, and how the existing or proposed reactors at Vogtle may be negatively impacted or unable to generate electricity. This was demonstrated by the heat wave this past summer in Europe—when nuclear power plants from Sweden to France had to shut down because the lake or river water temperatures were too high to allow for safe operation of the plants.

A large amount of water that is lost from Plant Vogtle currently is evaporative loss from the cooling towers. The NRC needs to evaluate the increased water vapor loss that is projected with

the addition of two new reactors — not only in terms of water lost from the supply source (the Savannah River), but also in terms of global warming. Water vapor has been identified as a contributor to global warming.

### Land Impacts

Nuclear power is viewed to have the greatest adverse impact on land compared to all other energy generation technologies. (See <http://www.powerscorecard.org/scorecard.cfm>.) As an example, the nuclear accident at one of the four nuclear reactors at the Chernobyl plant in the former Soviet Union in 1986 caused immediate deaths and sent radioactive fallout around the globe, touching nearly 3 billion people. Initially 130,000 people were evacuated and 175,000 acres of agricultural lands were abandoned. A long-term 30-kilometer “exclusion zone” around Chernobyl was eventually established and is in place today, twenty years later. The NRC should evaluate the potential land impacts from an accident at an expanded Plant Vogtle.

Additionally, nuclear power plants ultimately require large land areas for both high-level and low-level radioactive waste storage. Some of the land is then rendered unusable for thousands of years into the future due to the long-life and lethal nature of radioactive contaminants. The NRC should evaluate what effects long term, onsite storage of used spent fuel will have on the Plant Vogtle site and surrounding environment, especially in terms of an expanded facility. If the NRC determines that the waste will be moved to another site it should be definitively stated exactly where the waste will go and when it will be moved.

### Reprocessing and the Savannah River Site

The Bush administration has initiated the Global Nuclear Energy Partnership (GNEP) to revitalize and implement nuclear waste reprocessing. This is a massive, ill-conceived program for managing the world’s irradiated fuel created by commercial nuclear power plants, which increases global nuclear proliferation threats, among other serious concerns.

Reprocessing would require construction of new facilities, which are most likely to be located at the Savannah River Site (SRS). Reprocessing would increase the number of nuclear waste streams to be managed and is the dirtiest part of the nuclear fuel chain. It would increase the radioactivity and waste levels at SRS and result in added threats to human health and environmental damage in an area already highly contaminated.

SRS is a 1950s era, 310-square-mile site in South Carolina along the Savannah River across from Plant Vogtle. Due primarily to reprocessing for nuclear weapons production, enormous volumes of dangerous, long-lived nuclear waste were created at SRS. Tens of millions of gallons of highly radioactive liquid nuclear waste remain onsite in leaking tanks along with several radioactive waste burial grounds. SRS holds the largest amount of radioactivity in waste of any nuclear weapons facility in the country. Groundwater has been contaminated in South Carolina and Georgia, and drinking water supplies for the region, which primarily include the Savannah River itself, are continually threatened. The region is blighted already by the shadow of this federally listed superfund site, restarting reprocessing will only exacerbate an already unacceptable situation and put the surrounding communities at even greater risk.

The NRC needs to study the existing impacts SRS already has on the area and how the expansion of Plant Vogtle will add to these impacts. The NRC should also study how future projects at SRS, such as the GNEP reprocessing initiative, will further burden this area. The NRC needs to understand the larger picture that the communities, many low-income and minority, around Plant Vogtle have been burdened with decades of nuclear contamination and adding to this burden is unacceptable.

#### Safety & Security Concerns

Additionally, due to the proximity of SRS, building more reactors at Plant Vogtle makes the site more vulnerable by providing more terrorist targets. Though SRS existed when Vogtle was first built, SRS was not storing the same amount of radioactive materials as it is today, nor was it storing large stockpiles of weapons-grade plutonium in a highly dispersible, powder form. The terrorist attacks of 9/11/01 also had not occurred. We are living in a different time, and the NRC needs to acknowledge these realities. Emergency evacuation and planning measures need to be studied for the entire region given the high number of sensitive facilities in the area.

An 800-page report was done in 1980, NUREG/CR-1345, by a panel of industry experts to make future reactor designs more secure. A number of feasible, low-cost design changes to make nuclear plants less vulnerable to sabotage and acts of terror were offered and apparently not one of these low-cost changes appears in the so-called advanced reactor designs. We request that the NRC refer to this report and make sure that the new reactors proposed for Vogtle take these low-cost changes into account. The future safety of not only Waynesboro but the region is at stake.

#### Lack of Regulatory Oversight

Supporting an expansion of Georgia's nuclear power infrastructure requires that it is overseen properly for the public. The NRC should be aware that Georgia has a shortfall in terms of funding and capacity in Georgia to properly monitor the nuclear facilities we already have, let alone more that could be brought online in the future. Nuclear-generated electricity poses unique risks and Georgians deserve to know that their safety and their environment are being protected to the maximum extent needed. Monitoring programs need to be strengthened, not further compromised, to be able to deal with existing nuclear reactors. The NRC should study the State of Georgia's ability to adequately provide proper environmental radiation monitoring and emergency preparedness measures now and in the future if new reactors become a reality.

#### Alternative Energy Technologies

The NRC needs to thoroughly evaluate new advanced coal technology (IGCC) as an alternative to building more nuclear reactors in Georgia. The Southeast suffers severely from the impacts of air pollution and is predicted to experience global warming impacts as well. IGCC offers the ability to reduce air emissions, with up to 90% removal of sulfur dioxide, nitrogen oxide and mercury, and has the potential to capture carbon dioxide, a key global warming pollutant. Further, IGCC appears to be less water intensive than nuclear power. The Department of Energy National Energy Technology Laboratory's August 2005 report, *Power Plant Water Usage and Loss Study*, August 2005, analyzed water usage and loss by a variety of fossil-fueled power

plants including traditional pulverized coal, integrated gasification combined cycle (IGCC) and natural gas combined cycle (NGCC). The study reported total water loss as the following: 1087-1220 gallons/MWh for two technologies used at pulverized coal plants; 739-901 gallons/MWh for several IGCC technologies (utilizing coal or natural gas); and 585 gallons/MWh for natural gas combined cycle plants. For more water use figures for nuclear and coal-fired power plants, please refer to *Estimating Freshwater Needs to Meet 2025 Electricity Generating Capacity Forecasts*, Jeffrey Hoffmann, Sarah Forbes, and Thomas Feeley, U.S. Department of Energy/National Energy Technology Laboratory, June 2004.

### Public Involvement

The NRC needs to improve its public outreach process. For instance, there was no simple way for the general public to easily know about or provide comment on the ESP process. Visiting the NRC's Vogtle ESP page for instance, <http://www.nrc.gov/reactors/new-licensing/esp/vogtle.html>, provides some information on the timetable, such as the "Scoping Period Ends on 12/4/06" but it does not clearly show 1) that the deadline for the public to actually comment is also 12/4; 2) how the public can comment; or 3) a description on what to comment on. The NRC should make the page more easily understood on when and how a public citizen can engage in the process, especially in advance of the eventual release of a the draft EIS.

In summary, SACE has sincere concerns about the SNC ESP application to expand Plant Vogtle and we urge the NRC to carefully review our concerns and those of others as they develop the draft EIS. We believe that Georgia and the entire Southeast deserve an energy future based on energy efficiency and clean, safe energy supplies such as wind, solar, and bioenergy that can bring safe jobs and a more sustainable future to our citizens and environment.

Thank you for consideration of our comments.

Sincerely,

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