

May 22, 2007

Mr. Tom E. Tynan
Vice President - Vogtle
Vogtle Electric Generating Plant
7821 River Road
Waynesboro, GA 30830

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2 - AUDIT OF
SOUTHERN NUCLEAR OPERATING COMPANY, INC.'S, MANAGEMENT OF
REGULATORY COMMITMENTS (TAC NOS. MD4903 AND MD4904)

Dear Mr. Tynan:

The Office of Nuclear Reactor Regulation's (NRR's) Office Instruction LIC-105, Revision 1, "Managing Regulatory Commitments Made by Licensees to the NRC," provides the Nuclear Regulatory Commission (NRC) staff and its stakeholders with a common reference for handling regulatory commitments. LIC-105 specifies that once every 3 years, the NRC staff shall audit a licensee's commitment management program. The guidance is consistent with the industry guidance prepared by the Nuclear Energy Institute's (NEI's) NEI 99-04, "Guidance for Managing NRC Commitment Changes."

On April 10, 2007, the NRC staff performed an audit of Southern Nuclear Operating Company, Inc.'s (SNC's), regulatory commitment management program at Vogtle Electric Generating Plants, Units 1 and 2. The NRC staff concludes that, based on the audit and follow-up communications, SNC had implemented regulatory commitments on a timely basis. However, the NRC staff identified that SNC's process to document and manage NRC regulatory commitments was not developed using the guidance contained in NEI 99-04. Also, SNC needs to establish administrative controls for modifying or deleting commitments made to the NRC. Details of the audit are set forth in the enclosed audit report.

Sincerely,

/RA/

Balwant K. Singal, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-424 and 50-425

Enclosure:
Audit Report

cc w/encl: See next page

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION
OF REGULATORY COMMITMENTS MADE BY
SOUTHERN NUCLEAR OPERATING COMPANY, INC.
VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2
DOCKET NOS. 50-424 AND 50-425

1.0 INTRODUCTION AND BACKGROUND

The Office of Nuclear Reactor Regulation's (NRR's) Office Instruction LIC-105, Revision 1, "Managing Regulatory Commitments Made by Licensees to the NRC," provides the Nuclear Regulatory Commission (NRC) staff and its stakeholders with a common reference for handling regulatory commitments. LIC-105 specifies that once every 3 years, the NRC staff shall audit a licensee's commitment management program. LIC-105 is publicly available electronically from the Agencywide Documents Access and Management Systems (ADAMS) Public Electronic Reading Room on the Internet at the NRC web site www.nrc.gov (Accession Number ML042320463). The guidance is consistent with the industry guidance prepared by the Nuclear Energy Institute's (NEI's) NEI 99-04, "Guidance for Managing NRC Commitment Changes." The guidance in NEI 99-04 suggests that licensees use information management systems, annotations to procedures, or other methods to ensure the traceability of regulatory commitments after implementation. The staff and licensees observed that such systems help ensure that subsequent changes to regulatory commitments are evaluated using the change-control guidance in NEI 99-04.

According to LIC-105, a "regulatory commitment" is an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. LIC-105 further directs the NRR Project Manager to "audit the licensee's regulatory commitment management program by assessing the adequacy of the licensee's implementation of a sample of regulatory commitments made to the NRC in past licensing actions (amendments, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.)." The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

The NRC staff performed an on-site audit at the Vogtle Electric Generating Plant, Units 1 and 2 (Vogtle), on April 10, 2006, and reviewed regulatory commitments made by Southern Nuclear Operating Company, Inc. (SNC) in the past 3 years.

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2.1 Verification of Regulatory Commitment Implementation

The primary focus of the audit was to confirm that SNC has implemented the regulatory commitments made to the NRC as part of past licensing actions/activities and that each commitment is linked to the source document. For regulatory commitments that have not yet been implemented, the NRC staff is to ascertain that the regulatory commitments have been captured in an effective tracking program for future implementation. The scope of the verification was limited to the regulatory commitments selected for the audit.

2.1.1 Audit Scope

LIC-105 limits the audit of regulatory commitments to those made in writing to the NRC as a result of past licensing actions (amendments, reliefs, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Accordingly, the commitments integrated into the final safety analysis report (FSAR), quality assurance program, site security plan, emergency plan, or other documents governed by a change-control mechanism contained in regulations such as, Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.59 or 10 CFR 50.54 are excluded from the scope of the audit.

Before the audit, the NRC staff searched ADAMS for the licensee's licensing actions and licensing activity submittals dated in the last 3 years. The staff used the criteria in LIC-105 to select from regulatory commitments contained in this population for the audit. These regulatory commitments are shown on Table 1 (attached). A list of the regulatory commitments selected for the audit, along with the source documents, was provided to SNC one week in advance of the site visit to facilitate an effective audit.

SNC manages their regulatory commitments through its administrative control procedure 00409-C, "Commitment and Action Item Tracking." The procedure includes guidance on how to identify, document, track, and implement a commitment. The purpose of the procedure is also to provide guidance to prevent inadvertent deletion of a commitment without appropriate review.

2.1.2 Audit Results

The NRC staff reviewed the resolution documents generated by SNC for the regulatory commitments listed in Table 1. The NRC staff found that SNC staff was able to identify the regulatory commitments contained within the licensing actions/activities selected for the audit and document the status of its implementation.

SNC performed an independent self assessment of the regulatory commitments identified ahead of the audit and concluded that for a number of regulatory commitments, the guidance of procedure 00409-C for documenting and tracking the commitments, was not followed. These regulatory commitments were implemented into the resolution documents as stated in the source documents, however, without capturing these regulatory commitments into the data base and assigning a tracking number. SNC generated a number of Condition Reports (CRs) at the time of review to capture all these regulatory commitments and assign a tracking number to each commitment. The details of all the CRs are provided in Table 1.

2.2 SNC Program for Managing NRC Regulatory Commitments and Commitment Changes

Although SNC staff could identify and document the status of the regulatory commitments made to the NRC, SNC's process used to document and manage the commitments was not developed using the guidance contained in NEI 99-04. The last revision of SNC procedure 00409-C, Revision 22, was issued on October 06, 2004, which was after the endorsement by the NRC of NEI 99-04 in SECY-00-045, "Acceptance of NEI 99-04, "Guidelines for Managing NRC Commitments." However, the guidance of NEI 99-04 was not incorporated into the procedure. While NEI 99-04 is the preferred method for developing the processes and methods for managing NRC commitments, it is the NRC staff's expectation that other methods used by licensees to manage regulatory commitments and changes to those commitments should, at a minimum, achieve the same outcomes as those described in NEI 99-04.

As part of the audit, the NRC staff compared SNC's program described in procedure 00409-C, Revision 22, to the NEI guidelines. The NRC staff focused on the evaluation of regulatory commitment changes and NRC notification of those changes to the process recommended in the NEI guidelines. The staff documented its observations and recommendations in Section 3.0 of this audit report regarding that comparison. The staff discussed its expectation regarding the regulatory commitment management process with Mr. Jack Stringfellow and Mr. Randy Shepard of SNC during the audit. Mr. Stringfellow indicated that paragraph 6.1.2.10 of Procedure NMP-AD-008, Version 1.0, for Applicability Determinations does state that if the activity involves a change in a regulatory commitment, perform an evaluation in accordance with the applicable procedure for managing NRC commitments, consistent with NEI 99-04. However, no such procedure could be located and the existing procedure 00409-C does not provide guidance for change to a regulatory commitment. Also, procedure NMP-AD-008 is meant to perform applicability determinations for design, plant procedures, and licensing document changes only after the regulatory commitments have been implemented.

3.0 OBSERVATIONS AND RECOMMENDATIONS

Regulatory commitments are specific actions that have been agreed to or volunteered by a licensee and are documented in docketed correspondence. Unlike regulatory requirements, the creation and control of regulatory commitments is not described in a regulation or otherwise assigned a prescribed legal standing. However, the regulatory process appropriately relies on regulatory commitments in many instances and the NRC expects licensees to honor, in good faith, regulatory commitments made to the NRC staff as part of licensing activities. For issues that are risk significant or that are directly related to compliance with a regulatory requirement, the NRC staff has the ability to issue an enforcement action, e.g., an Order, or take other appropriate regulatory measures, e.g., a Notice of Deviation, if a licensee fails to implement or subsequently control regulatory commitments.

While the NRC staff's audit of SNC's regulatory commitment management program for Vogtle did not identify any regulatory commitments that were not satisfied, the NRC staff identified weaknesses in the process used to manage regulatory commitments and recommends that SNC either revise the existing procedure 00409-C or develop additional administrative controls and procedural guidance for managing changes to the regulatory commitments. Any resulting revisions to the regulatory commitment management process should consider the guidance in NEI 99-04 and LIC-105. As a minimum, SNC should consider revisions that:

1. Include a definition of a regulatory commitment that is consistent with NEI 99-04 and LIC-105 guidance and discriminates regulatory commitments made to the NRC from other commitments included in the database.
2. Include a clear change-control process that considers the safety and regulatory impact of the proposed change and includes provisions for notifying the NRC staff of changes, consistent with the guidance in NEI 99-04 and LIC-105.
3. Include clear guidance to ensure that regulatory commitments, that have been implemented, are traceable, i.e., that licensee personnel are able to recognize that future changes to the affected design features or operating practices require evaluation of the proposed change in accordance with the regulatory commitment change control process.
4. SNC generated a number of CRs for documents reviewed during the audit to create tracking numbers for regulatory commitments implemented in the past and these CRs are listed in Table 1. However, SNC was not consistent in generating these CRs. For some of the documents where regulatory commitments had already been implemented, SNC did not generate a CR. Hence, it is recommended that SNC should:
 - Assign a tracking number to all the regulatory commitments, even if the commitment had been implemented.
 - Associated resolution documents, especially the procedures, are revised to identify the regulatory commitments already implemented with the assigned tracking number.

SNC generated CR No. 2007104093, dated April 2, 2007, to address the coordination issues between the nuclear licensing group located in the corporate office (Birmingham) and the Performance Analysis Group (PAG) located at Vogtle site. PAG has the responsibility to implement procedure 00409-C to track all the regulatory commitments; however, the nuclear licensing group had been implementing the regulatory commitments without proper coordination with PAG. The purpose of the CR is to ensure proper communication between the two groups in the future.

4.0 CONCLUSION

The NRC staff concludes that, based on the results of the audit, (1) SNC had been implementing the regulatory commitments contained within the licensing actions selected for this audit, but the majority of the one's included in the scope of the audit did not have traceability, (2) SNC does not employ a regulatory commitment management program that is based on the guidance of NEI 99-04, and (3) SNC does not have a clear change-control process for the regulatory commitments.

5.0 SNC PERSONNEL CONTACTED FOR THIS AUDIT

Jack Stringfellow, SNC Licensing
Mukut Sharma, SNC Performance Analysis Group
Randy Shepard, SNC Performance Analysis Group

Attachment: Table 1, Audited Written Regulatory Commitments and Related Information

Principal Contributor: Balwant K. Singal

Date: May 22, 2007

TABLE 1
AUDITED WRITTEN REGULATORY COMMITMENTS AND RELATED INFORMATION

SNC'S Submittal	SNC Issuance	Summary of Regulatory Commitment	SNC's Implementation Status
NL-04-0564 (05/21/2004)	Eliminate requirements for hydrogen recombiners and hydrogen/oxygen monitors	Southern Nuclear Operating Company, Inc. (SNC) made a regulatory commitment to include the hydrogen monitors in the post-accident monitoring instrument program described in the Final Safety Analysis Report (FSAR) section 7.5.2.	Completed. FSAR Sections 6.2.5, 7.5.2.4, and Table 7.5.2-1 have been updated to implement the commitment. However, this commitment was not entered into the SYNCPOWR commitment tracking system and no condition report (CR) was generated.
NL-04-1204 (07/28/2004)	Eliminate requirements to provide monthly operating reports and occupational radiation exposure reports	SNC made a regulatory commitment to provide the Nuclear Regulatory Commission (NRC) using an industry data base the operating data (for each calendar month) that is described in Generic Letter (GL) 97-02, by the last day of the month following the end of each quarter.	Completed. Procedure 00163-C has been issued to provide the required reports by use of the industry data base. However, this commitment was not entered into the SYNCPOWR commitment tracking and do not have an assigned tracking number. SNC generated a CR No. 2007104383 on 04/09/2007 to add this commitment in SYNCPOWR for tracking.
NL-05-0299 (02/24/2005)	Degradation of steam generator (SG) internals	SNC made a regulatory commitment to perform the future non-destructive examination (NDE) inspections of the feedwater backing ring weld for all the SGs at least every six refueling outages.	Completed. Appendices 3 and 4 of the SG Program Strategic Plan NMP-ES-004-GL01 has been revised to implement the commitment. However, this commitment was not entered into the SYNCPOWR commitment tracking and does not have an assigned tracking number. SNC generated a CR No. 2007104384 on 04/09/2007 to add this commitment in SYNCPOWR for tracking.

TABLE 1
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SNC'S Submittal	SNC Issuance	Summary of Regulatory Commitment	SNC's Implementation Status
NL-05-1494 (08/24/2005) NL-06-0252 (02/11/2006)	SG surveillance program	SNC made a regulatory commitment to administratively limit operational primary-to-secondary leakage through any one SG to less than 150 gpd and committed to incorporate Technical Specification Task Force (TSTF) 449, Revision 4 within 6 months of the date of the TSTF letter.	Completed. Technical Specification (TS) 3.4.13 has already been amended to incorporate the commitment. However, this commitment was not entered into the SYNCPOWR commitment tracking system and no CR was generated.
NL-05-1699 (02/17/2006)	Addition of limiting condition for operation (LCO) to TSs for inoperability of snubbers using the consolidated line-item improvement process (CLIP)	SNC made a regulatory commitment to establish the TS Bases for LCO 3.0.8, add LCO 3.0.8 to the TSs, and renumber the existing LCO 3.0.8 to LCO 3.0.9.	Complete. TSs and Bases have been amended to incorporate the commitment. However, this commitment was not entered into the SYNCPOWR commitment tracking and does not have an assigned tracking number. SNC generated a CR No. 2007104392 on 04/09/2007 to add this commitment in SYNCPOWR for tracking.
NL-06-0734 (05/05/2006)	Surveillance test interval extensions for components of the reactor protection system (RPS)	SNC made a regulatory commitment to implement a program to monitor reactor trip system (RTS) and engineered safety feature actuation system (ESFAS) equipment unavailability and component failures to ensure consistency with the WCAP-15376 modeling assumptions.	TS amendment was approved by NRC on 09/01/2006 (ADAMS No. ML062360587). The commitment is scheduled for completion by 09/01/2007 and is being tracked (Action Item Code 2006204742).

TABLE 1
AUDITED WRITTEN REGULATORY COMMITMENTS AND RELATED INFORMATION

SNC'S Submittal	SNC Issuance	Summary of Regulatory Commitment	SNC's Implementation Status
NL-05-1264 (08/31/2005) NL-06-1275 (06/22/2006) NL-06-1483 (07/28/2006)	Potential impact of debris blockage on emergency recirculation during design basis accident at pressurized-water reactors (PWRs)	SNC made the following commitments: 1. Install new post-LOCA containment sump recirculation screens, including completion of required modifications and implementation of required procedural changes for Units 1 and 2 by Spring 2008 outage. 2. Install emergency core cooling system (ECCS) flow orifices on Unit 1 by spring 2008 outage.	Design change packages (DCPs) 1051646501 and 2051646601 have been issued to implement commitment 1 for Units 1 and 2. DCP 1060178401 has been issued to implement commitment 2 and the implementation of all the plant modifications and procedure changes is required to be completed by spring 2008 outage. However, these commitments were not entered into the SYNCPOWR commitment tracking and do not have an assigned tracking number. SNC generated CR Nos. 2007104390 and 2007104394 on 04/09/2007 to add these commitments in SYNCPOWR for tracking.
NL-06-2378 (10/20/2006)	Response to GL 2003-01, control room habitability	SNC made a regulatory commitment to submit a license amendment to incorporate the recommendation of TSTF-448 within 1 year after the approval of the TSTF.	NRC approved TSTF-448 in January 2007 and SNC is committed to submit the TS amendments to incorporate the recommendations of the TSTF within one year from the approval date. However, this commitment was not entered in to the SYNCPOWR commitment tracking and do not have an assigned tracking number. SNC generated a CR No. 2007104395 on 04/09/2007 to add this commitment in SYNCPOWR for tracking.

TABLE 1
AUDITED WRITTEN REGULATORY COMMITMENTS AND RELATED INFORMATION

SNC'S Submittal	SNC Issuance	Summary of Regulatory Commitment	SNC's Implementation Status
NL-06-2434 (10/20/2006) NL-07-0366 (02/21/2007)	Proposed alternatives for application of pressurizer nozzle full-structural weld overlays	SNC made the following regulatory commitments: 1. Confirm that the original leak before break (LBB) analyses are valid and the associated acceptance criteria are met after the weld overlays are applied. 2. Provide the NRC, within 14 days after the completion of the ultrasonic examination of weld overlays installation (a) the examination results of the weld overlays, (b) a discussion of any repairs to the overlay material and/or base metal and the reason for repair, and (c) will perform the subsequent inservice inspection in accordance with Q-4300 of Appendix Q of the American Society of Mechanical Engineer's, <i>Pressure and Vessel Code</i> , Section XI.	SNC submitted to the NRC the information requested in commitment 2(a), 2(b), and 2(c) by letters NL-07-0803 and NL-07-0859, dated 04/13/2007 and 04/18/2007 respectively, and the information is under review by the NRC. SNC issued a new commitment for continued compliance with commitment 2(d). There was no specific time specified for responding to commitment 1 and SNC is committed to comply with this commitment. SNC has generated CRs 2007104817 and 2007103644 on 04/20/2007 and 03/23/2007 respectively, for the Performance Analysis Group to add the commitments to SYNCPOWR for tracking.

TABLE 1
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SNC'S Submittal	SNC Issuance	Summary of Regulatory Commitment	SNC's Implementation Status
NL-07-0483 (03/06/2007)	Examination and mitigation of Alloy 82/182 pressurizer butt welds	<p>SNC made the following Vogtle specific regulatory commitments:</p> <ol style="list-style-type: none"> 1. Unit 1 will perform materials reliability program (MRP) 139 mitigation and post-mitigation examination activities on the pressurizer nozzles during the 1R14 outage. 2. SNC commits to adopt contingency plans to shut down Unit 1 by 12/31/2007, if technical information being developed by the MRP (or by industry) through advanced finite element analyses do not provide reasonable assurance to the NRC that primary water stress-corrosion cracking (PWSCC) crack conditions will remain stable and not lead to rupture without significant time from the onset of detectable leakage. The schedule could also be accelerated if new information is obtained during upcoming examinations that challenge current assumptions. 3. Unit 2 will perform MRP-139 mitigation and post-mitigation examination activities on the pressurizer nozzles during the 2R12 outage. 4. If a shutdown occurs due to excessive primary system unidentified leakage, and if the leakage cannot be confirmed to originate from a source other than the pressurizer nozzles, a bare metal visual examination of Alloy 82/182 weld locations on the pressurizer will be performed to determine whether the leakage originated at those locations. 5. Examinations of pressurizer weld overlays will be performed in accordance with MRP-139 and/or NRC-approved alternatives. 6. SNC will report to the NRC within 60 days of restart details of examination results of any unmitigated weld examinations and any corrective or mitigative action taken. SNC will report bare metal visual examination results to the NRC within 60 days of restart. 7. Processes described in Enclosures 1 & 2 of the letter for monitoring primary system leakage will be used until Alloy 82/182 butt weld locations on the pressurizer have been mitigated or examined. 	<p>Unit 2 has completed the MRP-139 mitigation and post-mitigation examination activities on the pressurizer nozzles during the 2R12 outage (March/April 2007). Hence, all the commitments for Unit 2 have been implemented. Revision 50 of Procedure 14905-1 for Unit 1 provides the monitoring and acceptance criteria for Commitment 7 until all the Alloy 82/182 butt weld locations on the pressurizer have been mitigated or examined. The rest of the commitments for Unit 1 are scheduled for completion at a later date.</p> <p>However, commitments made by this letter for both units were not entered into the SYNCPOWR commitment tracking and do not have an assigned tracking number. SNC generated a CR No. 2007104396 through 2007104402 on 04/09/2007 to add these commitments in SYNCPOWR for tracking.</p>

Vogtle Electric Generating Plant, Units 1 & 2

cc:

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