

**From:** "Moorer, Tom C." <TCMOORER@southernco.com>  
**To:** "Mark Notich" <mdn@nrc.gov>  
**Date:** 6/13/2007 5:51:05 PM  
**Subject:** Site Environmental Services Assessment+Greenfield annotated TCM.xls

<<Site Environmental Services Assessment+Greenfield annotated TCM.xls>>

Mark:

Please find attached the Excel spreadsheet we showed the team during the alternate site review process. As we discussed, the original purpose of this document was to compare Farley, Hatch, and Vogtle to determine which site was the best candidate to use for the first ESP. As you can see, we included dollar estimates that were used in the decision process. For obvious reasons, I have removed the amounts from this version of the document. We also included a greenfield comparison and although it does not specifically say it, the Barton site was used.

I hope this provides helpful information for the teams use. I am still looking into the DOE document we discussed and will call you tomorrow hopefully with an answer.

Also, I forwarded Van's questions/comments to Tetra-Tech and they are working on it to get me an answer back as soon as possible. I started a letter today providing the answers to the other questions in your email. Hope to have to you by the end of this week or early next week (based primarily on availability of Execs to sign).

Have a good evening. I will talk with you tomorrow.

TCM

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**Site Issues Assessments Form**

Item No.	ISSUE	Engineering Judgment (HATCH)			Engineering Judgment (FARLEY)			Engineering Judgment (VOGTLE)			Responsible Group	Comments
		MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED		
1	General Information Applicant:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	TEXT DOCUMENT ITEM - NO DIFFERENCE BETWEEN SITES
16	Description of Site Boundaries	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	TEXT DOCUMENT ITEM - NO DIFFERENCE BETWEEN SITES
	<b>Site Safety (PPE)</b>											
2	Description and Safety Assessment of Site and Facilities as identified in 10 CFR 100.10:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	TEXT DOCUMENT ITEM - NO DIFFERENCE BETWEEN SITES
3	Description of Thermal Facilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	TEXT DOCUMENT ITEM - NO DIFFERENCE BETWEEN SITES
15	Description of the numbers, type, and thermal power level of the facilities for which the site may be used.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	TEXT DOCUMENT ITEM - NO DIFFERENCE BETWEEN SITES
4	<b>Radiological</b>											ADVANTAGE VOGTLE
5	Effluents	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO DIFFERENCE BETWEEN SITES
6	Radwaste Systems/Facilities											10 CFR 50 Appendix I liquid total body limit (FSAR chapter 11). This limit could require additional radwaste equipment and/or structures at Hatch and Farley to justify adding additional reactors on the existing site.
7	Source Term	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		NO COST DIFFERENCE BETWEEN SITES
8	Material Movement	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		NO COST DIFFERENCE BETWEEN SITES
9	Monitoring	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		NO COST DIFFERENCE BETWEEN SITES
10	Station Accident	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	NO COST DIFFERENCE BETWEEN SITES	
	<b>Environmental Report</b>											

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		MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED		
27	Environmental Issues • Endangered species • Transmission Lines • Ground Water • Surface Water • NPDES • Chemical (Non Rad Effluent) • 316b • Historical Sites • Socioeconomics • Environmental Justice	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	GPD/EA	NO SIGNIFICANT DIFFERENCE BETWEEN SITES
22	Environmental Report Alternative Sites Studies	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	TEXT DOCUMENT ITEM - NO DIFFERENCE BETWEEN SITES

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		MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED		
11	<b>Thermal</b>										E&CS	NO SIGNIFICANT DIFFERENCE BETWEEN SITES
12	Effluents	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
13	Intakes	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
14	Outflows	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
18	<b>Characteristics of Site</b>											
19	Seismic & Geological	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	ADVANTAGE VOGTLE: NO SIGNIFICANT DIFFERENCE BETWEEN SITES Soil Liquefaction under seismic conditions is a problem for Hatch and could extensive analysis to prove site is acceptable
20	Metrological	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		NO SIGNIFICANT DIFFERENCE BETWEEN SITES
21	Hydrologic	\$ -	\$ -	BIG COST	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Salt Water Intrusion and issue for Hatch. It would be difficult to obtain any ground water withdrawal for the Hatch Site or an Alternative Site in the same region.
17	Land Acquisition	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS/GPC	ADVANTAGE VOGTLE
NEW	Water Withdrawal	\$ -	\$ -	BIG COST	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		ADVANTAGE VOGTLE

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NEW	Location of Facility • Reclaim Original 3/4 location and rebuild existing structures	\$1.7M	\$2.5M	\$2M				\$ -	\$ -	\$ -	SNC	ADVANTAGE VOGTLE
NEW	Transmission Lines	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO SIGNIFICANT COST DIFFERENCE BETWEEN SITES
26	Storm Water Management (Facility only, add land cost to land acquisition)	\$ -	\$ -	\$2M	\$ -	\$ -	\$2M	\$ -	\$ -	\$ -	E&CS	ADVANTAGE VOGTLE
29	Early Site Cost Review APC / GPC Legal Cost - SNC Action	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO COST DIFFERENCE BETWEEN SITES
	<b>Emergency Planning</b>											
24	Emergency Response Plan	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	Dependent on second site approach.

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		MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED		
25	Emergency Response Plan Public Relations / Media	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO DIFFERENCE BETWEEN SITES
	<b>ESP Application Cost</b>											
NEW	<b>Total Cost: Application &amp; Review</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO SIGNIFICANT DIFFERENCE BETWEEN SITES
NEW	Cost of Environmental Report content	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO SIGNIFICANT DIFFERENCE BETWEEN SITES
NEW	Cost of Technical and Emergency Planning content	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO SIGNIFICANT DIFFERENCE BETWEEN SITES
28	NRC Review Cost.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO SIGNIFICANT DIFFERENCE BETWEEN SITES

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		MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED		
23	Publishing Needs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	TEXT DOCUMENT ITEM - NO DIFFERENCE BETWEEN SITES
NEW	<u>Political Issues</u>											
NEW	Co-Owner Issue	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -			FARLEY ADVANTAGE
NEW	Land Condemnation/Purchase	\$ -	\$ -		\$ -	\$ -		\$ -	\$ -	\$ -		
NEW	PSC Support	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
30	• Public Support	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	NO COST DIFFERENCE BETWEEN SITES
31	<u>Transmission Lines</u>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	GPC	



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Item No.	ISSUE	Engineering Judgment (HATCH)			Engineering Judgment (FARLEY)			Engineering Judgment (VOGTLE)			Responsible Group	Comments
		MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED		
32	Security System	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	Dependent on if second site approach is used.
33	Constructability Heavy Transport to site	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
34	Heavy Equipment Haul Paths on site	\$ -	\$ -		\$ -	\$ -		\$ -	\$ -	\$ -	E&CS	
35	Rail Haul	\$ -	\$ -		\$ -	\$ -		\$ -	\$ -	\$ -	E&CS	
36	Batch / Fab Shop Space & Access	\$ -	\$ -		\$ -	\$ -		\$ -	\$ -	\$ -	E&CS	

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		MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED	MINIMUM	MAXIMUM	EXPECTED		
37	Construction Lay down	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
38	TAX (NPV)											
39	General State Sales & Use Tax (NPV)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	GPD/FINANCE	
40	Machinery State Sales & Use Tax (NPV)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
41	General Local Sales & Use Tax (NPV)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
42	Machinery Local Sales & Use Tax (NPV)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
43	Ad Valorem Tax (NPV)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
44	Piling	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
45	Underground Contractor	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
46	General Contractor	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
47	Construction Management	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	ND	
48	Project Controls	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
49	Project Management	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	ND	
50	Site Work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
51	Startup Engineering	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
52	Temporary Construction	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
53	Water Supply (tanks, reservoirs, pipelines, etc.)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
54	Equipment Delivery	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	E&CS	
55	Delivered Fuel	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	
56	O&M (NPV)											
57	O&M (associated with new unit) (NPV)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	SNC	
58	O&M (associated with existing unit resulting from new unit) (NPV)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
59	Political Issues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	GPC	
60	PSC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	GPC	
61	Litigations	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	GPC	
62	Ongoing Labor	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	ND	
63		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
	<b>Total Cost</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		

Regulatory Reference	Previous Site Specific Comments						Previous Overall Comments
	+/-	VOGTLE	+/-	HATCH	+/-	FARLEY	
10 CFR 50.33(a)(12)							No site specified advantages or disadvantages
10 CFR 52.17(a)(1)(ii)	+	Has enough land BIG PLUS		Potential need for additional land would impede schedule Storm water management may require additional land	-	Potential need for additional land would impede schedule Storm water management would require additional land	No site specific advantage. Alternate site Hatch approach will carry significant cost and licensing risk. Farley condemnation processes will result in negative publicity. Farley and Hatch land acquisition for storm water control will involve environmental issues and impacts.
10 CFR 50.34(a)(12) & 50.34(b)(10), 50.33(g) & (i), 50.34(b)(6)(v)							No site specified advantages or disadvantages
10 CFR 50.34(a)(1) and 10 CFR 52.17(a)(1)							Same effort all sites - Generic description
10 CFR 52.17(a)(1)(I)							No site specific advantage for generic. Gaseous radwaste effluent release limit may require additional radwaste facilities or an alternate second site approach for Hatch.  Alternate second site approach for Hatch could involve significant resources
10 CFR 52.17(a)(1)(i)-(iv) 10 CFR 52.17(a) (2) 10 CFR 51.45 10 CFR 51.50 10 CFR 50	+	Radiological effluent currently 10% of limit <b>BIG PLUS</b>	-	Radiological effluent currently 80% of limit, additional gaseous radwaste required, <b>BIG MINUS</b> Potential alternate 2 site license approach		Current radiological effluent releases plus ISFSI plus one additional reactor would push limit	Licensing Hatch second site might reduce release impact. However, Environmental, EPZ, Emergency Plan, etc. could see significant impacts and generation of a more extensive application would be required.

Greenfield	
Comment	Delta Add'!(SWAG)
SAME	-
NEW	Will require survey work/ mapping to define available site(s)
SAME	
SAME	
SAME	
NONE	

Regulatory Reference	Previous Site Specific Comments					Previous Overall Comments	
	+/-	VOGTLE	+/-	HATCH	+/-		FARLEY
10 CFR Part 51	-	<p>Current Endangered species issues</p> <p>Vogtle site will minimize endangered species impact due to site preparation for additional reactors during original construction</p> <p>Original Construction Final Environmental Impact Statement (NRC 1974) evaluated the Vogtle site for 4 Unit operations.</p>	-	<p>Current environmental permit at risk</p> <p>Storm water management</p> <p>Endangered species issue: license renewal (Shortnose Sturgeon)</p>	-	<p>Current Endangered species issues</p> <p>LR Environmental Report under NRC review. Draft Environmental Impact Statement scheduled for September 2004.</p>	<p><b>Potential Vogtle Advantage</b></p> <p>Recent ERs have been developed for the Hatch and Farley LR Applications. Some of this information would be applicable to the existing sites. There is not as much benefit if additional land is required. If VEGP LR and ESP ERs are developed at the same time there could be significant cost savings. Note: Environmental Project Managers for LR and ESP are drawn from the same NRC organization (License Renewal and Environmental Impacts Program).</p>
10 CFR 52.17(a)(2)						<p>NEI Working group to consider generic exception for current licensed sites. Existing sites offer lesser impact since most environmental, transportation, emergency plan are already fully addressed. Therefore offering great economic advantage and minimal total environmental impact. - NRC will require a green-field example for comparison</p>	

Greenfield	
Comment	Delta Add'!(SWAG)
NEW	Site selection criteria includes proximity to transmission lines; new lines are very expensive and some level of new transmission line construction will be required fro greenfield site
SAME	

Regulatory Reference	Previous Site Specific Comments						Previous Overall Comments
	+/-	VOGTLE	+/-	HATCH	+/-	FARLEY	
10 CFR 52.17(a)(1)(i)-(iv) 10 CFR 52.17(a)(1)(v) 10 CFR 52.17(a)(2)	+	Potential thermal plume No H <sub>2</sub> O intake or usage limit impacts No additional dredging noted	-	H <sub>2</sub> O impact potential, river frequently approaches temp limit in summer, low river level limits H <sub>2</sub> O availability	-	H <sub>2</sub> O impact potential, water pact (AL & GA) issues and additional drawdown for makeup	<b>All sites will require new intake structures and intake piping. Vogtle structure and lines could be located up-stream with minimal excavation and current facilities impact. Vogtle Up-stream location should have minimal environmental and endangered species</b>
10 CFR 52.17(a)(1)(vi) 10 CFR 52.17(a)(2) 10 CFR 51.45 10 CFR 51.50	+	Facility location boring program, Significant drilling information in potential site area. Deep Excavation may be required Original Construction Permit was for 4 unit operations	-	Extensive boring program, Shallow excavation, Lowland (flood plains) site Soil Liquefaction Issue Salt Water Intrusion	-	New Regulatory Guides may define new SSE and Require more in-depth soil investigation Extensive boring program, medium excavation, low seismic	<b>Vogtle good overall site boring data. Vogtle would require a limited boring program comprised of borings in proposed facility location and new river intake and piping locations.</b> <b>Farley and Hatch would require more extensive site boring programs. These programs would encompass larger less examined areas of the site and/or land additions and therefore of greater risk.</b> <b>New Regulatory Guides may define new SSE and Require more in-depth soil investigation</b>
10 CFR 52.17(a)(1)(iii)	+	Has enough land BIG PLUS	-	Potential need for additional land would impede schedule Storm water management may require additional land	-	Potential need for additional land would impede schedule Storm water management would require additional land	<b>No site specific advantage. Alternate site Hatch approach will carry significant cost and licensing risk. Farley condemnation processes will result in negative publicly. Farley and Hatch land acquisition for storm water control will involve environmental issues and impacts.</b>
10 CFR Part 51	+	Good water supply, low flow not a problem.	-	High Cost to address low river conditions for 4 unit operations. Additional land for lake or weir for river.	-	Chattahoochee Water War could affect request for additional withdrawal.  Chattahoochee River has adequate flow to support 4 Unit operations. There could be some legal issues with Georgia/Florida about taking additional water from Chattahoochee. New Water Use Certification would be required.  Hatch - River has adequate flow to support 4 Unit operations. 4 Unit operation would exceed current permit. Height of river in low flow periods is a concern for HNP. This would need to be resolved for 4 Unit operations. Possibly could add seismically designed weir in the river or build a lake of sufficient size to provide supply in low flow periods. Expect active environmental concerns from USFWS and NMFS for HNP (shortnose sturgeon).  Vogtle - River has adequate flow to support 4 Unit operations. 4 Unit operation would exceed current permit. Savannah River does not have the low flow issues HNP and FNP have.	<b>Vogtle Advantage</b>  <b>Farley - River has adequate flow to support 4 Unit operations. There could be some legal issues with Georgia/Florida about taking additional water from Chattahoochee. New Water Use Certification would be required.</b>  <b>Hatch - River has adequate flow to support 4 Unit operations. 4 Unit operation would exceed current permit. Height of river in low flow periods is a concern for HNP. This would need to be resolved for 4 Unit operations. Possibly could add seismically designed weir in the river or build a lake of sufficient size to provide supply in low flow periods. Expect active environmental concerns from USFWS and NMFS for HNP (shortnose sturgeon).</b>  <b>Vogtle - River has adequate flow to support 4 Unit operations. 4 Unit operation would exceed current permit. Savannah River does not have the low flow issues HNP and FNP have.</b>

Greenfield	
Comment	Delta Add'(SWAG)
SAME	
NEW SITE STUDIES	^New studies on multiple candidate sites + more than one year in additional schedule
NEW SITE	Sc hedule disadvantage up to 2 years if condemnation necessary
SAME	Depending on site location, there could be some additional concern regarding impacts of weater withdrawal

Regulatory Reference	Previous Site Specific Comments						Previous Overall Comments
	+/-	VOGTLE	+/-	HATCH	+/-	FARLEY	
10 CFR 52.17(a)(1)(iii) 10 CFR 100, subpart B	+	No structures have been built on the Unit 3/4 planned location	-	Structures have been located on the planned Unit 3/4 location. Reclaim original location and move existing structures or identify additional space for locating the facility. Could result in additional land purchase.	-	Structures have been located on the planned Unit 3/4 location. Reclaim original location and move existing structures or identify additional space for locating the facility. Could result in additional land purchase.	<b>Vogtle Advantage</b>  Location of the facility and site boundary information must be identified and described in the ESP Application to demonstrate that the requirements of 10 CFR Part 100, Subpart B are satisfied. Both Hatch and Farley have constructed structures on the originally proposed locations for additional Units. This land would have to be reclaimed or a new location determined. A new location could lead to purchase of additional land to meet the 10 CFR Part 100 requirements.
10 CFR Part 51		T & E Species Concerns Electric Shock (5mA Limit)		T & E Species Concerns Electric Shock (5mA Limit)		T & E Species Concerns Electric Shock (5mA Limit)	<b>No site specific advantage or disadvantage</b>  Environmental Impacts for any new/proposed transmission corridors would have to be evaluated. Electric shock is also an environmental impact issue that should factor into design and construction of any new lines. ES should be contacted for inputs prior to design and construction of additional transmission lines.
	+	Adequate storm water management facilities from original construction are currently functional	-	Would require development of storm water management system for construction area. Land would be required for a pond. Location of the pond would potentially require additional land.	-	Would require development of storm water management system for construction area. Land would be required for a pond. Location of the pond would require additional land.	<b>Advantage Vogtle</b>  <b>Land acquisition would probably require condemnation and would increase environmental issue impact.</b>
	-	Co-Owner Issues	-	Land Acquisition Issues Co-Owner Issues	-	Land Acquisition Issues	<b>No Specific Site Advantage</b>  <b>Advantage Farley</b>  Should note that current regulations would require antitrust to be addressed at any site if construction were pursued.  ESP Application requires a demonstration of Exclusion Area Authority and Control. This authority is tied to Co-Owners for Hatch and Vogtle. The current Co-Owner agreement for site authority expires at the end of life for Units 1 & 2 at Hatch and Vogtle. Any new nuclear units built at Hatch and Vogtle would require revision of the Nuclear Management Board Agreement and the Nuclear Operating Agreements prior to ESP Application submittal. Co-Owner agreements are required for VEGP License Renewal, changes could be sought for ESP at the same time.
10 CFR 52.17(b)-(c)				Alternate second site approach. Would require significant resources			<b>Only minor agreement impacts at all sites</b>

Greenfield	
Comment	Delta Add'!(SWAG)
Vogtle equivalent to Greenfield with minimal relocation effort (potential site near Vogtle)	
NEW	
SAVING OVER VOGTLE	
NEW	Impacts could include land acquisition, condemnation
NEW	

Regulatory Reference	Previous Site Specific Comments						Previous Overall Comments
	+/-	VOGTLE	+/-	HATCH	+/-	FARLEY	
10 CFR 52.17(b)-(c)							<p><b>No Specific Site Advantage</b></p> <p>Second site approach at Hatch, and addition land acquisition at Hatch or Farley could create significant cost impacts and public relations issues</p>
							<p>Cost includes development of ESP Application, NRC review, and support of NRC review. Additional costs that may need consideration are AFUDC and overhead charges.</p>
							<p><b>Potential Vogtle Advantage</b></p> <p>The cost for developing an ESP ER is the same for all three plants. One option is available to Vogtle that is not to Hatch and Farley. SNC is developing an ER for the Vogtle License Renewal application for submittal to NRC in June 2007. It would be prudent to combine the ESP and LR ERs development since they must address many of the same NEPA issues. If PO is structured correctly could result in savings. This assumes that ER development is managed similar to LR ER development with in house oversight and support.</p>
							<p><b>No Cost Difference Between Sites</b> (Potential Vogtle advantage if LR and ESP ER activities are performed concurrently).</p>
							<p><b>NO DIFFERENCE BETWEEN SITES.</b></p> <p>One potential benefit for Vogtle if combined with LR Environmental Report review, could lower total NRC review fees for both projects. Coordination of NRC RAls and public meetings could be additional benefits.</p>

Greenfield	
Comment	Delta Add'!(SWAG)
NEW	
SAME	
ASSUME DOUBLE TO INCORPORATE NEW STUDY INFO	
NEW SITE LIKELY TO RESULT IN HIGHER END	
SAME	

Regulatory Reference	Previous Site Specific Comments						Previous Overall Comments
	+/-	VOGTLE	+/-	HATCH	+/-	FARLEY	
			-	<p>Would require significantly more extensive application for Hatch second site approach.</p> <p>Would require more extensive submittal due to site size impacts. This is particularly true if additional land is required and/or environmental issues result from the acquisition.</p>	-	<p>Would require more extensive submittal due to site size impacts. This is particularly true if additional land is required and/or environmental issues result from the acquisition.</p>	<p><b>No specific site advantage</b></p> <p><b>Acquisition of additional land may involve negative publicity</b></p>
		Co-Owner Issues		Co-Owner Issues			<p><b>Farley Advantage</b></p> <p>One issue to consider. Proceeding with a Vogtle ESP Application in the same time frame as a LR Application could provide some political cover. It could be sold as a prudent cost saving business decision. Others in the industry are developing ESP Applications and since a LR Application shares many of the same elements Southern Company is developing both at the same time. If Southern Company desires no Co-Owners if new units are constructed at Vogtle, then some settlement/agreement would have to be reached with Co-Owners.</p>
				May be needed		Needed	
		Some Organized State Opposition Good Public Support		Some Organized State Opposition Good Public Support		Good Public Support Historically less organized opposition	
							<p>The NEI Working Group should seek a generic exception with the NRC for currently licensed sites. Existing sites offer lesser impact since most environmental, transportation, emergency plan are already fully addressed. Therefore, offering great economic advantage and minimal total environment impact.</p>

Greenfield	
Comment	Delta Add'!(SWAG)
SAME	
No Co-owners may yield benefit vs Hatch & Vogtle	
NEW / POSSIBLE	
LIKELY GREATER POLITICAL CAPITAL	
SAME	



Regulatory Reference	Previous Site Specific Comments					Previous Overall Comments
	+/-	VOGTLE	+/-	HATCH	+/-	
			-	Will need to redo entire system. Alternate 2 site approval would require new system		
	+	No. 1 site facilities would need update	-	No. 3 site Dredging expense for River Access	+	No. 2 site lesser risk already has dock facility to unload
	+	- River Access Okay	+	- Railroad Access Okay	+	- Railroad Access Okay
	+	- Railroad Access Okay	+	Local Public bridges of limited capacity	-	Multi-state river use negotiations could impact higher required flows to allow barge access
	+	- Road access Okay				
	+	River haul road in good condition	-	River haul road in poor condition	+	River haul road in poor condition. Services limited area.
	+	Original site ring haul road in good condition. Enables construction without risk to operating unit	-	No site	-	No site ring haul road.
			-	No site ring haul road.	-	Current buried facilities risk
			-	Current buried facilities risk		
		Okay		Okay		Okay
		No penetration of current protected area required		No penetration of current protected area required		No penetration of current protected area required
	+	Full access to lay down areas	-	No current access to lay down space	-	No current access to lay down space
	+	Full access to haul roads	-	Limited access to haul road	-	Limited access to haul road
	+	Full access to bulk storage, warehouse, batch plant, etc areas	-	No access to bulk storage warehouse, batch plant, etc. area	-	No access to bulk storage warehouse, batch plant, etc. area
	+	Original batch plant, warehouse, bulk storage, etc. areas are available and full access exist.	-	Original batch plant, warehouse, bulk storage, etc. area have been utilized for other purpose. Future potential may have access limitations and/or require additional land purchase		Original batch plant, warehouse, bulk storage, etc. area have been utilized for other purpose. Future potential may have access limitations and/or require additional land purchase

Greenfield	
Comment	Delta Add'!(SWAG)
NEW	
NEW	
NEW	
NEW	
NEW	

