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## **SUBJECT: MAINTENANCE OF PLANT VOGTLE TRANSMISSION LINE CORRIDORS**

Certain commitments have been made by Georgia Power Company to the Nuclear Regulatory Commission concerning the continued maintenance of right-of-way on the Plant Vogtle transmission lines. These lines are defined as the Vogtle - McIntosh - Thalmann 500 k.v., Vogtle - Scherer 500 k.v., Vogtle - South Carolina State Line 230 k.v., and Vogtle - Goshen #2 and #3 230 k.v. lines (O.P. C.) Georgia Transmission.

The commitments are a part of the Facility Operating License for the Vogtle Electric Generating and as such, are accountable to the Nuclear Regulatory Commission in the same way as the plant itself

### **COMMITMENT #10362- USE OF HERBICIDES**

The use of herbicides within the Vogtle Electric Generating Plant transmission line corridors shall conform to the approved use of selected herbicides as registered by the Environmental Protection Agency and approved by the State of Georgia authorities and applied as directed on the herbicide label. The licensee's Forester concerning herbicides use shall maintain records in accordance with EPA or State of Georgia requirements. Such records shall be made readily available to the N.R.C. upon request. Intention to use herbicides on these rights-of-way must be reported to the Georgia Power Company Environmental Affairs Department as a matter of record before such application is done.

### **COMMITMENT #10364- NOISE MONITORING**

Complaints received by Georgia Power Company regarding noise along the high voltage transmission lines, and a report of the actions taken in response to any complaints shall be submitted to the Environmental Affairs Department of Georgia Power Company for inclusion in the N.R.C. Annual Report.

### **COMMITMENT #10614- EBENEZER CREEK**

Ebenezer Creek swamp is designated as a National Natural Landmark Area by the Federal Government. Any routine maintenance involving trimming of trees within the area defined by the standing trees on the right-of-way shall be done by hand. This includes reclearing of access area around structure and topping trees necessary to maintain a minimum of twenty-five (25) feet from the energized conductors. Ingress and egress to Ebenezer Creek shall be via the Old Augusta Road and the previously cleared road used during construction. Maintenance clearing on these roads is allowed. Board roads and mats can be utilized, but must be removed upon completion of the job. Before any routine reclearing or trimming is done, the Environmental Affairs Department of the Georgia Power Company shall be notified.

## **WETLAND MAINTENANCE**

Maintenance activities within the designated Wetland areas shall not result in disturbance to the bottom substrate. Rubber tire or track vehicles are allowed as long as no substrate disturbance occurs. When necessary, board roads or mats should be used to avoid substrate destruction. No dredge or fill activities or other operations which will result in a discharge of sediment is allowed within the wetland areas without a U.S. Army Corps of Engineers permit. When mechanical or hand clearing is not feasible, approved herbicide use in the wetland area is allowed.

## **REPORTING OF ENDANGERED OR STATE PROTECTED SPECIES**

Unusual occurrences or the mortality of an endangered or protected species shall be reported to the Environmental Affairs Department within 24 hours of the discovery of the event. An unusual occurrence is defined as nesting activity or a large concentration of a protected species occurring on the transmission line corridor. Examples of protected species, which may occur on the Vogtle transmission lines, are the American Alligator, Wood Stork, Bald Eagle, Eastern Indigo Snake, Red Cockade Woodpecker, and Osprey. There shall be no disturbance of a sighted species or its nest until approved by the Environmental Affairs Department.

## **EMERGENCY CONDITIONS**

When emergency conditions exist which make compliance with this document impractical, the Environmental Affairs Department should be notified as quickly as possible so that the appropriate regulatory agencies can be contacted. Emergency conditions are defined as those conditions, which may result in an imminent loss of line service, or those conditions necessary to prevent or restore line service or prevent imminent loss of life.

## **COMMITMENTS #10615 AND #10363- CULTURAL RESOURCE MANAGEMENT PLAN**

The following operation and maintenance specifications apply to areas designated as Cultural Properties. These properties are designated for perpetual conservation. Cultural Properties are identified on documents and plan sheets on file with Area T&S Centers and the Land Department, Corporate Office. Special provisions on access to and distribution of these maps are provided with other specifications herein. The number of cultural properties on each right-of-way is as follows:

Right-of-Way # CP	
Vogtle-McIntosh-Thalmann 500kV	54
Vogtle-Wadley-Scherer 500kV	60
Vogtle-Goshen 230kV (OPC)	12
Vogtle-South Carolina 230kV	6

Treatment of these cultural properties in all operation and maintenance activities will be done in accordance with the specifications listed hereinafter.

### **1. Specification #1 - Periodic Reclearing**

Reclearing of cultural properties will be conducted with tractor (rubber tired) mounted rotary or drum mowers, except where properties have been identified to contain surface features. At these properties, all reclearing will be done by hand. Any necessary debris removal from all reclearing will be conducted by hand, and no burning or burial of such debris is allowed inside cultural properties. Mowing of cultural properties is to be conducted only in dry conditions. Specification #5, Vehicle-Equipment Access, will apply to all reclearing operations. The Senior Archaeologist will assist the Regions as needed to inform contractors and other personnel regarding cultural resource management requirements applicable to their work.

## 2. Specification #2 - Side Trimming and Danger Tree Removal

All necessary side trimming of trees at cultural properties will be undertaken by hand. Cutting of danger trees will be done using chain saws. Any necessary debris removal from either of these activities will be done by hand and no burning or burial of debris is allowed inside cultural properties. Specification #5, Vehicle-Equipment Access, will apply to all side trimming and danger tree removal activities.

## 3. Specification #3 - On-Site Inspections (Foot Patrol)

In all on-site inspection operations, Specification #5, Vehicle-Equipment Access, will apply. All deliberate care will be taken to avoid any affecting to cultural properties by any ground disturbing actions.

## 4. Specification #4 - Normal Maintenance

### A. Structures/Conductor Outside Cultural Properties:

In all normal maintenance activities involving work on line structures or conductor spans located either outside of or directly adjacent to cultural properties, Specification #5, Vehicle-Equipment Access, will apply. No activities may be conducted inside of those adjacent properties. No guy wires may be placed inside of any cultural properties.

### B. Structures/Conductor Inside Cultural Properties:

Normal maintenance activities involving structures or conductor spans located inside the cultural properties are not restricted within 50 feet of either side of the center of the structure. This will provide a Designated Work Area (DWA) of 100 feet in length, (x line right-of-way width) measured along the centerline. Access for vehicles and equipment across cultural properties to this DWA must be confined to any existing scraping. Where no access roads are present, DWA access must be made by use of matting or similar devices that will protect ground surfaces from disturbance.

### C. General:

In all normal maintenance activities to line structures or conductor spans no burning or burial of debris is allowed within any cultural properties. No materials laydown or equipment marshaling yards may be established in any cultural properties except within the DWA for properties within which line structures are located.

## 5. Specification #5 - Vehicle/Equipment Access

### A. Trucks - Cars :

No trucks or cars are allowed inside of any cultural properties unless they are strictly confined to any existing access road, for such vehicles have a gross vehicle weight rating (GVWR) of not more than 10,000 pounds, or mats or similar devices are used to protect ground surfaces from all disturbance.

### B. Equipment :

No cleated-track equipment of any type is allowed inside of cultural properties unless they are strictly confined to any existing access road, or mats or similar devices are used to protect ground surfaces from all disturbance.

### C. Special Restrictions:

1. NO VEHICLES OR EQUIPMENT of any type or GVWR are allowed inside any cultural properties identified as having surface features such as chimney piles, foundations, or other similar features WHETHER OR NOT EXISTING ROADS PASS THROUGH SUCH PROPERTIES. Properties under this restriction are identified on the Cultural Properties

## Data Lists.

2. Where existing roads pass through cultural properties, ALL VEHICLES AND EQUIPMENT, of any type or GVWR, will be strictly confined to such roads. Existing roads passing through cultural properties cannot be graded or scraped to improve access.

3. The Cultural Properties Management Plan by its restriction on disturbance of the ground, would prohibit installation of other non-line-related facilities such as distribution lines, telephone, gas, water, sewer, and other buried utilities through designated properties without first complying with the provisions described in Electric Operations Bulletin #17, Part III.

## 6. Specification #6 - Artifact Collection - Disturbance of Cultural Properties and Access to Information:

In the conduct of all activities, by all Regions and Departments, involving the Vogtle associated transmission line routes, the collection of artifacts or other cultural materials from above or below the ground surface, or other disturbance of cultural properties will not be allowed unless directly pertinent to resource management or scientific studies provided for under the Cultural Resource Management Plan. All requests to conduct activities for the collection of any artifacts or other cultural materials, or any other disturbance of cultural properties must be referred to and approved in advance by the Senior Archaeologist, Land Department, Corporate Office. Regions will be informed, in advance, of any authorized activities. Regions will assist in implementing this restriction by reporting to the Senior Archaeologist any evidence of artifact collection, disturbance, or unusual conditions noted at cultural properties or report of any such activities.

Information on Cultural Properties Data Lists and maps maintained by Regions regarding the location of cultural properties is CONFIDENTIAL. Only those persons with the need to know cultural properties locations during operations and maintenance activities are to have access to the location information without the advanced approval of the Senior Archaeologist, Land Department, Corporate Office. Regions will work with the Senior Archaeologist to determine appropriate system for control of this information.

## 7. Specification #7 - Francis Plantation Complex (GP-WG-01)

### A. Location :

The Vogtle-Wadley-Scherer line crosses the Francis Plantation Complex between structures 230-231. Georgia Power Company as GP-WG-0 1 identifies the portion of this complex located with the line route. This entire complex, including GP-WG-0 1 is listed on the National Register of Historic Places.

### B. Restrictions:

1. All topping and trimming of trees, when necessary to maintain a 25-foot conductor clearance, and the removal of any debris, must be conducted by hand. No burning or burial of debris or material is allowed inside GP-WG-0 1. No live trees may be cut down on this property. No herbicides may be used on this property. No disturbance of the ground or the building located within GP-WG-01 is allowed.

2. All normal maintenance to structures 230 and 231 or to conductor spans crossing GP-WG-0 1 shall be done by hand.

3. The Senior Archaeologist, Land Department, Corporate Office, shall be informed of all intended topping, trimming, normal maintenance activities to structures 230 and 231, and conductor spanning GP-WG-01 a minimum of ten (10) working days prior to commencement of any such activities.

8. Specification #8 - Right-of-Way Improvements:

A. Right-of-Way Conversions - Georgia Power Company will not promote and/or assist in any manner any conversion of cultural properties into pasture, croplands, game food plots, tree farms, or any other activity, which could result in any ground disturbing activities.

B. Erosion Control, Rock Fords, Culverts, Gates - Neither of the following activities may be undertaken by Georgia Power Company or its contractors on cultural properties without the advance approval of the Senior Archaeologist, Land Department, Corporate Office: (grading, grassing or any replanting, installation of gates, rock fords, culverts, or any similar construction)

9. Specification #9 – Encroachments:

The Cultural Resource Management Plan includes specific provisions for review of all encroachments. Details on the procedure for review of encroachments are outlined in Distribution Bulletin 12-01.

10. Specification #10 - Emergency Maintenance:

Emergency maintenance activities are defined as those actions necessary to restore line service or to prevent the imminent loss of line service. Such operations would be potentially required as a result of storms, vandalism, or accidents. In all such cases reasonable care will be taken, but the restrictions imposed by this bulletin would be lifted until such time as all necessary activities are completed.

After all such activities are completed, the Senior Archaeologist, Land Department, Corporate Office, with assistance as necessary by the Regions, will inspect or cause to be inspected all areas involved in emergency maintenance activities. The purpose of such inspections will be to determine what, if any, effect may have occurred to cultural properties. If such effect has occurred appropriate Cultural Resource Management studies will be undertaken as part of the total emergency effort.

The Regions will notify the Senior Archaeologist, Land Department, Corporate Office, as soon as possible should any emergency maintenance activities is required. Such notification shall include the location of the emergency, description of the problem or problems and the anticipated actions necessary.

**RESPONSIBILITY**

The overall administration of the Environmental Commitment is through the Georgia Power Company Environmental Affairs Department, contact the Licensing and Compliance Manager.

The administration of the Cultural Properties Management Plan is through the Georgia Power Company Land Department, contact the Senior Archaeologist in the Corporate Office.

The responsibility for adherence to the Commitments and Management Plan rest with each operating region and district along the routes.

APPROVED: \_\_\_\_\_  
KENNY FOLSOM, SUPERVISOR  
TRANSMISSION LINE DESIGN MAINTENANCE & RELIABILITY

APPROVED: \_\_\_\_\_  
GERALD WILLIAMSON, MANAGER  
TRANSMISSION CONSTRUCTION & LINE DESIGN