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August 27, 2008

VIA FEDERAL EXPRESS

Lawrence D. Sanders, Esq.
Turner Environmental Law Clinic
Emory University School of Law
1301 Clifton Road
Atlanta, GA 30322

Patrick A. Moulding, Esq.
U.S. Nuclear Regulatory Commission
Office of the General Counsel
1155 Rockville Pike, Stop O-15 D21
Washington, D.C. 20852-0001

Re: Twelfth Supplemental Disclosures Pursuant to 10 CFR § 2.336 for Contentions EC 1.2 and EC 1.3 Admitted on March 12, 2007 (LBP-07-03); *Southern Nuclear Operating Co.* (Early Site Permit for Vogtle ESP Site), Docket No. 52-011-ESP

Dear Messrs. Sanders and Moulding:

Pursuant to 10 CFR § 2.336 and the agreement between the parties as set forth in the Atomic Safety and Licensing Board's ("ASLB") Order of April 3, 2007 regarding mandatory disclosures ("April 3 Order"), Southern Nuclear Operating Company, Inc. ("Southern Nuclear") is providing the attached twelfth supplemental disclosures regarding Contentions EC 1.2 and EC 1.3 admitted by the ASLB's Order of March 12, 2007. Attached is a supporting affidavit of Mr. Charles R. Pierce, Southern Nuclear's Vogtle Deployment Licensing Manager.

Documents and Data Compilations:

Attachment A provides a description of additional documents in the possession, custody, or control of Southern Nuclear that are relevant to the admitted contentions. Southern Nuclear is still in the process of reviewing each document identified in Attachment A to confirm whether or not they contain proprietary or privileged information. We will make those final determinations only as you request copies of specific documents. Thus, Attachment A may be over-inclusive in some respects in that it may include documents that are not discoverable based on 10 CFR § 2.336 or the ASLB's April 3 Order.

Sincerely,

K.C. Hairston

KCH:dkf

Attachment

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board

In the Matter of)	Docket No. 52-011-ESP
Southern Nuclear Operating Company)	ASLBP No. 07-850-01-ESP-BD01
(Early Site Permit for Vogtle ESP Site))	August 25, 2008

CERTIFICATION OF TWELFTH SUPPLEMENTAL DISCLOSURES
AFFIDAVIT OF CHARLES R. PIERCE

COUNTY OF SHELBY)
)
STATE OF ALABAMA)

I, **CHARLES R. PIERCE**, being duly sworn according to law, depose and state the following:

I am the Vogtle Deployment Licensing Manager for Southern Nuclear Operating Company, Inc. ("Southern Nuclear"). My business address is 42 Inverness Center Parkway, Birmingham, Alabama 35242. I am authorized to provide this certification on behalf of Southern Nuclear.

To the best of my knowledge, information and belief, Southern Nuclear's Twelfth Supplemental Disclosures in the above captioned proceeding contain all materials required to be disclosed by 10 C.F.R. § 2.336, as modified by the Atomic Safety and Licensing Board's Order of April 3, 2007 (Ruling Regarding Joint Motion on Mandatory Disclosures and Scheduling Prehearing Conference), that were identified as relevant through a search of the information and documentation reasonably available to and under the possession, custody, or control (including

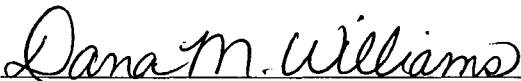
its applicable affiliates and contractors) of Southern Nuclear. Further, to the best of my knowledge, information and belief, and based on the review of information and documentation currently reasonably available to and under the possession, custody, or control of Southern Nuclear, these disclosures are accurate and complete as of this date.

Further, the affiant sayeth not.

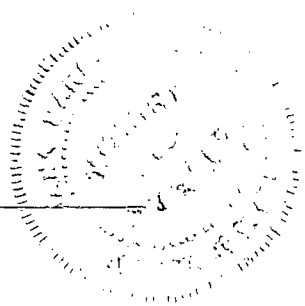


CHARLES R. PIERCE

Subscribed and sworn to before me this 25th day of August, 2008.



NOTARY PUBLIC
My Commission Expires: 12/29/2010



Document No.	Beginning Bates	Ending Bates	Document Name	Document Date	Source	Document Type
SNC604	TBD	TBD	Email from Anthony Dodd to Mathew Montz regarding river intake studies.	7/28/2008	Southern Nuclear	E-mail
SNC605	TBD	TBD	Email from Anthony Dodd to Paul Geoghegan regarding river samples.	7/28/2008	Southern Nuclear	E-mail
SNC606	TBD	TBD	Email from D'Andre Manigo to Matthew Montz, et al. regarding river samples.	7/31/2008	Southern Nuclear	E-mail
SNC607	TBD	TBD	Email from Paul Geoghegan to Anthony Dodd, et al. regarding river samples.	7/31/2008	Normandeau Associates, Inc.	E-mail
SNC608	TBD	TBD	Email from Anthony Dodd to Matthew Montz regarding I&E sampling.	8/4/2008	Southern Nuclear	E-mail
SNC609	TBD	TBD	Email from Anthony Dodd to Hannah Proctor, et al. regarding river sampling.	8/6/2008	Southern Nuclear	E-mail
SNC610	TBD	TBD	Email from Jonathan Ponstein to Matthew Montz regarding HZI vector data with related direction data.	8/12/2008	Alabama Power	E-mail
SNC611	TBD	TBD	Email from Anthony Dodd to J. Strube, et al. regarding river samples.	8/13/2008	Southern Nuclear	E-mail
SNC612	TBD	TBD	Email from Anthony Dodd to Matthew Montz regarding river sampling.	8/21/2008	Southern Nuclear	E-mail
SNC613	TBD	TBD	Email from Anthony Dodd to Kenneth Middlebrooks, et al. regarding river sampling.	8/20/2008	Southern Nuclear	E-mail
SNC614	TBD	TBD	Email from D'Andre Manigo to Matthew Montz, et al. regarding river sampling.	8/21/2008	Southern Nuclear	E-mail
SNC615	TBD	TBD	Email from Anthony Dodd to Matthew Montz, et al. regarding river samples.	8/23/2008	Southern Nuclear	E-mail